



HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500
FAX 804 • 788 • 8218

EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031273
DATE: 07/29/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending June 30, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 41,649.90
Current Charges:	402.00

CURRENT INVOICE AMOUNT DUE:	\$ 42,051.90
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Information with Wire: File: 054740.0000016, Inv: 114031273, Date: 07/29/2022



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INVOICE SUMMARY-REMITTANCE PAGE

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
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DATE: 07/29/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

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FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031273
DATE: 07/29/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH JUNE 30, 2022:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/11/2022	W ANDREWS	Outline complaint strategy.	0.50
05/25/2022	C D STEKLOF	Review prior correspondence with AIG and operative policy provisions in order to draft complaint (2.7); draft complaint against AIG (2.3).	5.00
05/26/2022	C D STEKLOF	Draft complaint against AIG regarding unpaid defense costs	3.00
05/27/2022	C D STEKLOF	Draft complaint against AIG regarding unpaid defense costs	6.60
05/31/2022	C D STEKLOF	Draft complaint against AIG regarding unpaid defense costs	6.50
06/01/2022	W ANDREWS	Continue to review proposed edits to draft complaint.	1.00
06/01/2022	C D STEKLOF	Draft and revise complaint against AIG and incorporate proposed changes from Mr. Andrews	5.10
06/02/2022	A DEFIELD	Analyze, revise and supplement complaint; review prior memo and policy.	1.80
06/02/2022	C D STEKLOF	Analyze proposed revisions to complaint from Ms. DeField, incorporate same, and finalize complaint for client's review and approval	1.70
06/06/2022	W ANDREWS	Review Mr. Kurtz's and Mr. Schwinghamer's comments on draft complaint.	0.50
06/06/2022	C D STEKLOF	Incorporate client revisions to complaint against AIG and draft correspondence to AIG providing filed complaint and inviting voluntary mediation	2.40
06/07/2022	V CHAPUNOFF	Finalize and prepare exhibits to Complaint, draft Civil Cover Sheet and Waiver of Service of Summons, and e-file Complaint and Civil Cover Sheet.	1.70

HUNTON ANDREWS KURTH LLP CLIENT NAME: U.S. Sugar Corporation FILE NUMBER: 054740.0000016			INVOICE: 114031273 DATE: 07/29/2022 PAGE: 2
DATE	TIMEKEEPER	DESCRIPTION	HOURS
06/07/2022	C D STEKLOF	Finalize complaint for filing, review exhibits to complaint, and coordinate filing of same (1.6); revise correspondence to AIG regarding opportunity to mediate prior to litigation (1.0).	2.60
06/09/2022	C D STEKLOF	Address issues related to filing of complaint against AIG	0.30
06/14/2022	C D STEKLOF	Review orders entered by district court judge and magistrate judge regarding procedures applicable to litigation and relevant local rules	1.00
06/21/2022	W ANDREWS	Review service and mediation issues and damages calculations.	0.50
06/21/2022	C D STEKLOF	Evaluate opposing counsel's request for defense cost figure and invoices and exchange various correspondence with team and client regarding same	0.90
06/22/2022	W ANDREWS	Review litigation strategy.	1.00
06/22/2022	C D STEKLOF	Review invoices compiled by client and exchange correspondence with team regarding recoverable damages in coverage suit with AIG	1.20
06/23/2022	V CHAPUNOFF	Analyze docket entries 1-4 related to complaint with exhibits, and discovery orders, prepare court pleadings index to reflect same, and analyze next steps as to preparing notice of filing corrected exhibit to complaint, including call with clerk.	0.90
06/23/2022	C D STEKLOF	Exchange correspondence regarding appropriate calculation of damages for coverage suit	0.30
06/24/2022	C D STEKLOF	Analyze issues related to calculation of covered damages and exchange correspondence with opposing counsel regarding request for invoices connected to underlying suit	1.20
06/26/2022	C D STEKLOF	Analyze breakdown of fees and costs incurred by U.S. Sugar, draft correspondence to client regarding additional information needed, and exchange correspondence with team regarding same	0.70
06/28/2022	C D STEKLOF	Analyze various issues related to recoverable damages against AIG	1.30
06/29/2022	V CHAPUNOFF	Prepare Gunster and Mayer Brown invoice calculations in preparation for initial demand to AIG.	0.30
06/29/2022	C D STEKLOF	Exchange correspondence with opposing counsel regarding request for defense cost information and review spreadsheet compiled by client regarding same	0.40
06/30/2022	C D STEKLOF	Analyze issues related to recoverable damages and exchange various correspondence with opposing counsel and client regarding potential mediation and total defense expenses	2.30
TOTAL HOURS			50.70

HUNTON ANDREWS KURTH LLP	INVOICE:	114031273
CLIENT NAME: U.S. Sugar Corporation	DATE:	07/29/2022
FILE NUMBER: 054740.0000016	PAGE:	3

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	3.50	1,112.00	3,892.00
A DEFIELD	Partner	1.80	851.00	1,531.80
C D STEKLOF	Counsel	42.50	833.00	35,402.50
V CHAPUNOFF	Paralegal	2.90	284.00	823.60
TOTAL FEES (\$)				41,649.90

FOR COSTS ADVANCED AND EXPENSES INCURRED:

CODE	DESCRIPTION	DATE	DESCRIPTION	AMOUNT
E124	Other	06/07/2022	VENDOR: Capital One Bank - Mastercard INVOICE#: 093143 DATE: 6/7/2022 Florida Southern District Court -Vivian Chapunoff	402.00
			TOTAL E124 OTHER	402.00
			TOTAL CURRENT EXPENSES (\$)	402.00

INVOICE SUMMARY:

Current Fees:	\$ 41,649.90
Current Charges:	402.00
CURRENT INVOICE AMOUNT DUE:	\$ 42,051.90



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INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031363
DATE: 08/29/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending July 31, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 18,727.10
Current Charges:	20.30
CURRENT INVOICE AMOUNT DUE:	\$ 18,747.40

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114031273	0000016	07/29/2022	42,051.90

Outstanding Balance (for matter(s) on this invoice): 42,051.90

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 60,799.30

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Information with Wire: File: 054740.0000016, Inv: 114031363, Date: 08/29/2022



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U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
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FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031363
DATE: 08/29/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending July 31, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 18,727.10
Current Charges:	20.30
CURRENT INVOICE AMOUNT DUE:	\$ 18,747.40

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114031273	0000016	07/29/2022	42,051.90

Outstanding Balance (for matter(s) on this invoice): 42,051.90

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 60,799.30

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FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031363
DATE: 08/29/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH JULY 31, 2022:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
07/01/2022	W ANDREWS	Review mediation developments and strategy.	0.50
07/01/2022	C D STEKLOF	Exchange correspondence with opposing counsel regarding mediation and waiver of service of summons	0.50
07/06/2022	W ANDREWS	Review mediation strategy.	0.50
07/06/2022	C D STEKLOF	Exchange correspondence regarding insurer's interest in mediation and potential mediators for dispute	0.90
07/07/2022	C D STEKLOF	Exchange correspondence regarding mediation with AIG	0.20
07/08/2022	C D STEKLOF	Exchange correspondence regarding potential mediators	0.40
07/11/2022	W ANDREWS	Review background regarding proposed mediators and consider strategy regarding same.	0.80
07/11/2022	C D STEKLOF	Exchange correspondence regarding potential mediators for matter	0.50
07/12/2022	W ANDREWS	Review mediation developments and strategy.	0.50
07/12/2022	C D STEKLOF	Exchange correspondence regarding potential mediators	0.30
07/13/2022	C D STEKLOF	Exchange correspondence regarding potential mediators and scheduling of mediation	0.60
07/14/2022	C D STEKLOF	Exchange various correspondence regarding potential mediators	0.70
07/15/2022	W ANDREWS	Review mediation strategy.	0.50
07/18/2022	W ANDREWS	Review mediation and service of process strategy.	0.50

CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114031363
 DATE: 08/29/2022
 PAGE: 4

DATE	TIMEKEEPER	DESCRIPTION	HOURS
07/18/2022	A DEFIELD	Analyze service and mediation issues and confer with team on same.	0.80
07/18/2022	C D STEKLOF	Review order from court regarding service of complaint to AIG and analyze options in connection with same in light of mediation	1.30
07/19/2022	C D STEKLOF	Address various issues related to mediation scheduling and exchange various correspondence with client, mediators, and opposing counsel regarding mediation alternatives in light of Spector unavailability	2.30
07/20/2022	W ANDREWS	Review mediation strategy.	0.50
07/20/2022	A DEFIELD	Consider mediation issues and update.	0.50
07/20/2022	C D STEKLOF	Exchange correspondence regarding mediation scheduling and new mediators	0.50
07/21/2022	W ANDREWS	Review mediation strategy per call with Mr. Kurtz.	0.50
07/21/2022	A DEFIELD	Analyze spend and totals for mediation and analyze pre-tender spend issue; analyze mediator selection issues involving Brian Spector and brainstorming of additional mediators.	0.50
07/21/2022	C D STEKLOF	Communicate with client regarding potential mediators and AIG's request for invoices (.6); exchange various correspondence with team and opposing counsel regarding mediator selection and scheduling (1.7); exchange correspondence with opposing counsel regarding timing to answer complaint and analyze next steps in connection with same (.7).	3.00
07/22/2022	W ANDREWS	Review coverage issues raised by Mr. Kurtz.	1.00
07/26/2022	C D STEKLOF	Evaluate potential alternative mediators and communicate with Mr. Andrews regarding same	0.60
07/27/2022	C D STEKLOF	Exchange various correspondence regarding new potential mediators	0.60
07/28/2022	C D STEKLOF	Exchange various correspondence regarding new potential mediators and draft correspondence to client regarding same	0.50
07/29/2022	W ANDREWS	Review mediation strategy.	0.50
TOTAL HOURS			20.50

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	5.80	1,112.00	6,449.60
A DEFIELD	Partner	1.80	851.00	1,531.80
C D STEKLOF	Counsel	12.90	833.00	10,745.70
TOTAL FEES (\$)				18,727.10

CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114031363
DATE: 08/29/2022
PAGE: 5

FOR COSTS ADVANCED AND EXPENSES INCURRED:

CODE	DESCRIPTION	AMOUNT
E106	Online Research	20.30
TOTAL CURRENT EXPENSES (\$)		20.30

INVOICE SUMMARY:

Current Fees:	\$ 18,727.10
Current Charges:	20.30
CURRENT INVOICE AMOUNT DUE:	\$ 18,747.40



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INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031534
DATE: 09/28/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending August 31, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 16,103.80
Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 16,103.80

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114031273	0000016	07/29/2022	42,051.90

Outstanding Balance (for matter(s) on this invoice):	42,051.90
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TOTAL AMOUNT DUE (including Current Invoice Amount Due):	58,155.70
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FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031534
DATE: 09/28/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

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Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 16,103.80

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TOTAL AMOUNT DUE (including Current Invoice Amount Due):	58,155.70

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FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031534
DATE: 09/28/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH AUGUST 31, 2022:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
08/01/2022	C D STEKLOF	Research issues related to scheduling of new potential mediators and exchange correspondence with client and opposing counsel regarding same	1.00
08/03/2022	W ANDREWS	Review new AIG position on mediation.	0.50
08/03/2022	A DEFIELD	Discuss mediators with Mr. Steklof and Mr. Andrews.	0.20
08/03/2022	C D STEKLOF	Exchange correspondence regarding new potential mediators	0.60
08/04/2022	W ANDREWS	Work on mediation strategy.	0.50
08/04/2022	A DEFIELD	Discuss mediator rates and selection issues.	0.10
08/04/2022	C D STEKLOF	Address various issues related to mediation scheduling and exchange correspondence with client and opposing counsel regarding same	1.00
08/08/2022	V CHAPUNOFF	Prepare revised waiver of service of summons for execution by opposing counsel.	0.10
08/08/2022	A DEFIELD	Develop service strategy with Mr. Steklof and review correspondence to opposing counsel concerning same.	0.30
08/08/2022	C D STEKLOF	Draft correspondence to client regarding status of matter (.3); exchange correspondence with team regarding next steps with waiver of service and draft correspondence to opposing counsel regarding same (.9).	1.20
08/10/2022	W ANDREWS	Review settlement correspondence from AIG and consider next steps.	0.50
08/10/2022	C D STEKLOF	Exchange correspondence with client and opposing counsel regarding mediation scheduling and service of complaint	0.50

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114031534
 DATE: 09/28/2022
 PAGE: 4

DATE	TIMEKEEPER	DESCRIPTION	HOURS
08/11/2022	W ANDREWS	Work on mediation strategy.	0.50
08/11/2022	C D STEKLOF	Exchange various correspondence with client regarding mediation scheduling and compilation of documents for production to carriers (.4); draft correspondence to opposing counsel regarding mediation and request for invoices (.5); coordinate filing of waiver of service and exchange correspondence with excess insurer regarding request for information (.6).	1.60
08/12/2022	C D STEKLOF	Exchange various correspondence with client regarding final scheduled mediation and potential filing of Motion for Judgment on the Pleadings prior to mediation	0.60
08/14/2022	C D STEKLOF	Review prior NDA agreements with AIG to evaluate appropriate terms for sharing invoices in advance of mediation	0.40
08/15/2022	C D STEKLOF	Draft and revise proposed NDA in connection with production of invoices and documents prior to mediation and draft correspondence to client regarding same (1.9); address various issues related to litigation deadlines following answer by AIG (.4).	2.30
08/18/2022	C D STEKLOF	Exchange correspondence regarding invoices for redaction and status request from excess insurer	0.20
08/22/2022	W ANDREWS	Review AIG answer to complaint and outline strategy regarding motion for judgment on the pleadings.	1.00
08/22/2022	V CHAPUNOFF	Prepare for database 531 invoices received from client on August 18, 2022.	0.50
08/22/2022	C D STEKLOF	Exchange correspondence regarding necessary review of invoices for production to carrier (.2); review and analyze Answer filed by AIG and draft correspondence to client regarding same (1.1).	1.30
08/23/2022	W ANDREWS	Review and comment on proposed litigation strategy.	0.50
08/23/2022	V CHAPUNOFF	Draft Plaintiff's Rule 7.1 Corporate Disclosure Statement, and e-file.	0.50
08/23/2022	C D STEKLOF	Communicate with Mr. Andrews regarding litigation strategy and exchange various correspondence with client regarding same (.8); coordinate filing of corporate disclosure statement (.3).	1.10
08/25/2022	W ANDREWS	Review case strategy.	0.50
08/25/2022	V CHAPUNOFF	Prepare for database 531 invoices received from client on August 18, 2022.	0.40
08/31/2022	V CHAPUNOFF	Analyze next steps in connection with review and redaction of 531 invoices in preparation for production to AIG.	0.20

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114031534
DATE: 09/28/2022
PAGE: 5

DATE	TIMEKEEPER	DESCRIPTION	HOURS
08/31/2022	C D STEKLOF	Coordinate privilege review of client invoices and communicate with Ms. Chapunoff regarding same (.6); exchange various correspondence with opposing counsel regarding Rule 16 conferral and NDA (.4).	1.00
TOTAL HOURS			19.10

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	4.00	1,112.00	4,448.00
A DEFIELD	Partner	0.60	851.00	510.60
C D STEKLOF	Counsel	12.80	833.00	10,662.40
V CHAPUNOFF	Paralegal	1.70	284.00	482.80
TOTAL FEES (\$)			16,103.80	

INVOICE SUMMARY:

Current Fees:	\$ 16,103.80
Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 16,103.80



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INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031613
DATE: 10/10/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending September 30, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 63,432.40
Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 63,432.40

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114031273	0000016	07/29/2022	42,051.90
114031534	0000016	09/28/2022	16,103.80

Outstanding Balance (for matter(s) on this invoice): 58,155.70

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 121,588.10

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PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: [REDACTED]
ABA Transit: [REDACTED]
Swift Code (International): [REDACTED]

Information with Wire: File: 054740.0000016, Inv: 114031613, Date: 10/10/2022



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EIN 54-0572269

INVOICE SUMMARY-REMITTANCE PAGE

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031613
DATE: 10/10/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending September 30, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 63,432.40
Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 63,432.40

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114031273	0000016	07/29/2022	42,051.90
114031534	0000016	09/28/2022	16,103.80

Outstanding Balance (for matter(s) on this invoice): 58,155.70

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 121,588.10

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To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: [REDACTED]
ABA Transit: [REDACTED]
Swift Code (International): [REDACTED]
Information with Wire: File: 054740.0000016, Inv: 114031613, Date: 10/10/2022



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EIN 54-0572269

INVOICE DETAIL

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031613
DATE: 10/10/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH SEPTEMBER 30, 2022:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
09/01/2022	C D STEKLOF	Review pleadings in case and motions for judgment on the pleadings on comparable issues and draft outline of U.S. Sugar's motion (3.0); draft motion for judgment on the pleadings (3.3).	6.30
09/02/2022	C D STEKLOF	Draft Motion for Partial Judgment on the Pleadings regarding erosion of self-insured retention by defense expenses	6.70
09/05/2022	C D STEKLOF	Review breakdown of invoices received from client and draft correspondence to Ms. Chapunoff regarding review of same	0.30
09/06/2022	V CHAPUNOFF	Analyze next steps in connection with review and redaction of 531 invoices in preparation for production to AIG.	1.50
09/06/2022	C D STEKLOF	Draft motion for partial judgment on the pleadings.	5.00
09/06/2022	C D STEKLOF	Communicate regarding review of invoices for production to insurer and necessary redactions.	0.50
09/07/2022	V CHAPUNOFF	Identify, analyze, and prepare for databases invoices received from client on September 7, 2022, and supplement invoice tracking chart to reflect updates.	0.20
09/07/2022	C D STEKLOF	Draft motion for judgment on the pleadings regarding application of self-insured retention	1.30
09/08/2022	W ANDREWS	Review strategy regarding defense firm bill production.	0.50
09/10/2022	C D STEKLOF	Exchange correspondence with opposing counsel regarding NDA and Rule 26(f) conference	0.20
09/11/2022	C D STEKLOF	Draft motion for partial judgment on the pleadings regarding erosion of self-insured retention	2.20

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114031613
 DATE: 10/10/2022
 PAGE: 4

DATE	TIMEKEEPER	DESCRIPTION	HOURS
09/12/2022	W ANDREWS	Outline strategy for case management conferral conference.	0.50
09/12/2022	V CHAPUNOFF	Analyze next steps in connection with review and redaction of invoices in preparation for production to AIG.	0.20
09/12/2022	C D STEKLOF	Compile draft Joint Scheduling Report for consideration by opposing counsel (1.0); conduct Rule 26(f) conference with opposing counsel (.5); draft and revise motion for partial judgment on the pleadings (7.1).	8.60
09/13/2022	W ANDREWS	Work on draft motion for judgment on the pleadings.	1.00
09/13/2022	V CHAPUNOFF	Analyze Gunster invoices, and identify and redact confidential information in said invoices, in preparation for production to AIG and mediation.	3.50
09/13/2022	C D STEKLOF	Revise motion for partial judgment on the pleadings	2.20
09/14/2022	W ANDREWS	Review and supplement draft motion for judgment on the pleadings.	2.00
09/14/2022	V CHAPUNOFF	Analyze Gunster invoices, and identify and redact confidential information in said invoices, in preparation for production to AIG and mediation.	1.00
09/14/2022	C D STEKLOF	Revise motion for partial judgment on the pleadings and incorporate proposed revisions from Mr. Andrews	2.80
09/15/2022	W ANDREWS	Work on draft motion for judgment on the pleadings.	1.50
09/15/2022	C D STEKLOF	Communicate with Mr. Andrews regarding final revisions to Motion for Partial Judgment on the Pleadings and incorporate changes to same (2.0); review final draft of same before client review (1.2); review AIG's proposed changes and additions to joint scheduling report and incorporate changes to same (1.3).	4.50
09/16/2022	W ANDREWS	Review and comment on draft scheduling report to submit to court.	0.50
09/16/2022	C D STEKLOF	Analyze AIG's proposed NDA to govern production of invoices and evaluate additional provisions to be included	1.40
09/17/2022	W ANDREWS	Work on negotiating draft pretrial order.	0.50
09/17/2022	C D STEKLOF	Exchange correspondence regarding proposed revisions to Joint Scheduling Report	0.30
09/19/2022	W ANDREWS	Review litigation strategy.	0.50
09/19/2022	C D STEKLOF	Analyze issues related to revised NDA provided by AIG and incorporate necessary revisions to same (1.4); analyze various issues related to next steps in litigation (.4).	1.80

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114031613
 DATE: 10/10/2022
 PAGE: 5

DATE	TIMEKEEPER	DESCRIPTION	HOURS
09/20/2022	C D STEKLOF	Review and address redactions to selected defense cost invoices invoices to provide to AIG in connection with mediation	2.50
09/21/2022	W ANDREWS	Telephone call with Mr. Kurtz regarding litigation strategy; review comments on draft summary judgment motion.	1.00
09/21/2022	V CHAPUNOFF	Analyze, cite-check, and revise draft Motion for Partial Judgment on the Pleadings, and e-file.	2.10
09/21/2022	C D STEKLOF	Review comments and revisions to Motion for Partial Judgment on the Pleadings and review final draft of same to prepare for filing with Court (3.7); finalize redline revisions to joint scheduling report and NDA and provide same to opposing counsel for review and comment (.7).	4.40
09/21/2022	C D STEKLOF	Review and supplement redactions to invoices to be provided to AIG in advance of mediation.	3.00
09/22/2022	W ANDREWS	Review litigation strategy.	0.50
09/22/2022	W ANDREWS	Review correspondence regarding defense costs.	0.50
09/22/2022	V CHAPUNOFF	Analyze next steps in connection with identifying and redacting confidential information in Gunster invoices, in preparation for production to AIG and mediation.	0.10
09/22/2022	C D STEKLOF	Review invoices for redaction before providing to AIG (1.8); exchange correspondence with client regarding status of litigation (.2).	2.00
09/23/2022	C D STEKLOF	Exchange correspondence with team and opposing counsel regarding request for extension on AIG's opposition to motion for judgment on the pleadings	0.30
09/25/2022	C D STEKLOF	Draft correspondence to opposing counsel regarding joint status report	0.10
09/26/2022	W ANDREWS	Exchange correspondence regarding case management order.	1.00
09/26/2022	C D STEKLOF	Review correspondence from opposing counsel canceling mediation, communicate with Mr. Andrews regarding same, and draft correspondence to client with update (1.1); revise and finalize joint scheduling report for filing with court (.6).	1.70
09/27/2022	W ANDREWS	Review court order and consider next steps; review correspondence from counsel for AIG.	0.80
09/27/2022	C D STEKLOF	Exchange various correspondence regarding rescheduling of mediation and response to insurer's request for extension to oppose motion for judgment on the pleadings	0.70
TOTAL HOURS			78.20

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114031613
DATE: 10/10/2022
PAGE: 6

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	10.80	1,112.00	12,009.60
C D STEKLOF	Counsel	58.80	833.00	48,980.40
V CHAPUNOFF	Paralegal	8.60	284.00	2,442.40
TOTAL FEES (\$)				63,432.40

INVOICE SUMMARY:

Current Fees:	\$ 63,432.40
Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 63,432.40



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EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031901
DATE: 11/30/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending October 31, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 15,288.10
Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 15,288.10

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To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: [REDACTED]
ABA Transit: [REDACTED]
Swift Code (International): [REDACTED]

Information with Wire: File: 054740.0000016, Inv: 114031901, Date: 11/30/2022



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EIN 54-0572269

INVOICE SUMMARY-REMITTANCE PAGE

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031901
DATE: 11/30/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending October 31, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 15,288.10
Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 15,288.10

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ATLANTA, GA 30384-5759

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Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: [REDACTED]
ABA Transit: [REDACTED]
Swift Code (International): [REDACTED]
Information with Wire: File: 054740.0000016, Inv: 114031901, Date: 11/30/2022



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333 SE 2ND AVENUE
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EIN 54-0572269

INVOICE DETAIL

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114031901
DATE: 11/30/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH OCTOBER 31, 2022:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
10/03/2022	C D STEKLOF	Review various scheduling orders issued by Court and exchange correspondence regarding scheduling of new mediation	0.80
10/05/2022	V CHAPUNOFF	Analyze docket entries 5-17, related to waiver of service of summons, corporate disclosure statements, Answer, Motion for Partial Summary Judgment, Discovery Plan and Conference Report, Scheduling Order and Order of Referral to Mediation, and Motion for Extension of Time to Respond to Motion to Dismiss, and supplement court pleadings index to reflect same.	0.40
10/06/2022	C D STEKLOF	Exchange various correspondence regarding rescheduling mediation in accordance with Court order	0.40
10/07/2022	C D STEKLOF	Exchange various correspondence regarding rescheduling of mediation	0.20
10/10/2022	C D STEKLOF	Exchange various correspondence regarding scheduling of mediation	0.10
10/11/2022	C D STEKLOF	Analyze strategy in connection with motion for partial judgment on the pleadings and oral argument	0.30
10/21/2022	W ANDREWS	Review opposition to motion for partial judgment on the pleadings.	1.00
10/21/2022	C D STEKLOF	Initial review of AIG's response to motion for judgment on the pleadings and exchange correspondence regarding same	0.70
10/22/2022	C D STEKLOF	Exchange correspondence in connection with reply in support of motion for judgment on the pleadings	0.20
10/26/2022	V CHAPUNOFF	Analyze draft U.S. Sugar's Unopposed Motion for Extension of Time, and e-file.	0.30

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114031901
 DATE: 11/30/2022
 PAGE: 4

DATE	TIMEKEEPER	DESCRIPTION	HOURS
10/26/2022	C D STEKLOF	Draft correspondence to opposing counsel regarding motion for extension of time, draft and revise same, coordinate filing, and review order entered by court	1.40
10/28/2022	V CHAPUNOFF	Draft Rule 26 Disclosures.	0.60
10/28/2022	C D STEKLOF	Analyze AIG's opposition to motion for judgment on the pleadings, analyze citations to authority, and outline appropriate response	4.00
10/31/2022	W ANDREWS	Review arguments for reply brief.	1.00
10/31/2022	J A HANRAHAN	Research case law regarding motions for partial judgment on the pleadings.	1.50
10/31/2022	C D STEKLOF	Communicate with Mr. Andrews regarding key issues to address in reply and analyze new research required in connection with AIG's procedural argument against motion (.8); research additional case law to support reply (2.0); draft reply in support of motion for judgment on the pleadings (3.4).	6.20
TOTAL HOURS			19.10

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	2.00	1,112.00	2,224.00
C D STEKLOF	Counsel	14.30	833.00	11,911.90
J A HANRAHAN	Associate	1.50	522.00	783.00
V CHAPUNOFF	Paralegal	1.30	284.00	369.20
TOTAL FEES (\$)				15,288.10

INVOICE SUMMARY:

Current Fees:	\$ 15,288.10
Current Charges:	0.00

CURRENT INVOICE AMOUNT DUE: \$ 15,288.10



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EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032014
DATE: 12/14/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending November 30, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 38,910.90
Current Charges:	416.78
CURRENT INVOICE AMOUNT DUE:	\$ 39,327.68

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114031901	0000016	11/30/2022	15,288.10

Outstanding Balance (for matter(s) on this invoice):	15,288.10
TOTAL AMOUNT DUE (including Current Invoice Amount Due):	54,615.78

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PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
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Account Name: Hunton Andrews Kurth LLP Operating
Account Number: [REDACTED]
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Swift Code (International): [REDACTED]

Information with Wire: File: 054740.0000016, Inv: 114032014, Date: 12/14/2022



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EIN 54-0572269

INVOICE SUMMARY-REMITTANCE PAGE

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032014
DATE: 12/14/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending November 30, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 38,910.90
Current Charges:	416.78
CURRENT INVOICE AMOUNT DUE:	\$ 39,327.68

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114031901	0000016	11/30/2022	15,288.10

Outstanding Balance (for matter(s) on this invoice):	15,288.10
TOTAL AMOUNT DUE (including Current Invoice Amount Due):	54,615.78

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ABA Transit: [REDACTED]
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EIN 54-0572269

INVOICE DETAIL

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032014
DATE: 12/14/2022

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH NOVEMBER 30, 2022:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
11/01/2022	J A HANRAHAN	Research case law regarding appropriateness of motions for partial judgment on the pleadings.	0.70
11/01/2022	C D STEKLOF	Draft reply in support of motion for judgment on the pleadings regarding self-insured retention	7.20
11/02/2022	W ANDREWS	Review reply brief strategy.	0.50
11/02/2022	C D STEKLOF	Draft and revise reply in support of motion for partial judgment on the pleadings	6.20
11/03/2022	W ANDREWS	Review and supplement draft reply brief in support of motion for judgment on the pleadings.	1.50
11/03/2022	C D STEKLOF	Draft and revise Rule 26 disclosures and draft correspondence to client regarding same (1.7); revise motion for partial judgment on the pleadings and incorporate comments and revisions from Mr. Andrews (4.8).	6.50
11/04/2022	V CHAPUNOFF	Analyze next steps in connection with preparing reply in support of motion for partial judgment on the pleadings.	0.10
11/04/2022	S E MEHARG	Cite check Reply in Support of Motion for Partial Judgment on the Pleadings	3.00
11/04/2022	C D STEKLOF	Revise and finalize reply in support of motion for partial judgment on the pleadings for client review (3.2); finalize Rule 26 disclosures for service to AIG and serve same (.8); review Rule 26 disclosures from AIG (.2).	4.20
11/06/2022	C D STEKLOF	Address issues related to finalizing reply in support of motion for judgment on the pleadings	0.20

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114032014
 DATE: 12/14/2022
 PAGE: 4

DATE	TIMEKEEPER	DESCRIPTION	HOURS
11/07/2022	V CHAPUNOFF	Analyze information sent to and from opposing counsel regarding disclosures, and to and from client regarding Reply in Support of Motion for Partial Judgment on the Pleadings.	0.10
11/07/2022	C D STEKLOF	Finalize and coordinate filing of reply in support of motion for partial judgment on the pleadings and draft analysis to client regarding same	1.60
11/08/2022	C D STEKLOF	Draft analysis to client regarding briefing and next steps in connection with litigation	1.30
11/11/2022	C D STEKLOF	Exchange correspondence with opposing counsel regarding joint status report to Court	0.10
11/14/2022	V CHAPUNOFF	Analyze docket entries 18-39 related to Reply in Support of Motion for Partial Judgment on the Pleadings, and Defendant's pro hac vice motions, and supplement court pleadings index to reflect same.	0.40
11/18/2022	W ANDREWS	Review and supplement draft status report required by court and consider discovery strategy in light of same.	0.70
11/18/2022	C D STEKLOF	Draft and revise joint status report to court and mediation order and exchange correspondence regarding same	2.50
11/21/2022	W ANDREWS	Work on court submission and review discovery strategy in light of same.	0.70
11/21/2022	C D STEKLOF	Analyze various issues related to joint status report and discovery going forward	0.30
11/22/2022	W ANDREWS	Review and supplement draft status report to court and review discovery strategy in light of same.	0.70
11/22/2022	C D STEKLOF	Revise proposed joint interim status report and exchange correspondence regarding same	0.70
11/23/2022	W ANDREWS	Review AIG discovery requests and consider next steps regarding same.	0.70
11/23/2022	V CHAPUNOFF	Analyze information sent to client on November 23, 2022, regarding discovery matters.	0.20
11/23/2022	C D STEKLOF	Draft detailed correspondence to client regarding discovery strategy and production of invoices and finalize joint interim status report for review by opposing counsel	1.70
11/27/2022	C D STEKLOF	Incorporate necessary revisions to joint scheduling report and draft correspondence to client regarding next steps in connection with discovery	1.30
11/28/2022	W ANDREWS	Review discovery strategy; review AIG proposed changes to proposed joint status report and revise and supplement same.	1.00

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114032014
DATE: 12/14/2022
PAGE: 5

DATE	TIMEKEEPER	DESCRIPTION	HOURS
11/28/2022	C D STEKLOF	Communicate with Mr. Andrews regarding litigation and joint scheduling report and incorporate revisions to same (.8); exchange various correspondence with opposing counsel to finalize report and coordinate filing of same (.9).	1.70
11/30/2022	W ANDREWS	Review new discovery requests from AIG and consider strategy regarding same; review summary judgment oral argument strategy.	1.00
11/30/2022	C D STEKLOF	Analyze litigation strategy going forward and draft correspondence to client regarding same	0.40
TOTAL HOURS			47.20

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	6.80	1,112.00	7,561.60
C D STEKLOF	Counsel	35.90	833.00	29,904.70
J A HANRAHAN	Associate	0.70	522.00	365.40
V CHAPUNOFF	Paralegal	0.80	284.00	227.20
S E MEHARG	Paralegal	3.00	284.00	852.00
TOTAL FEES (\$)				38,910.90

FOR COSTS ADVANCED AND EXPENSES INCURRED:

CODE	DESCRIPTION	AMOUNT
E106	Online Research	416.78
TOTAL CURRENT EXPENSES (\$)		416.78

INVOICE SUMMARY:

Current Fees: \$ 38,910.90
Current Charges: 416.78

CURRENT INVOICE AMOUNT DUE: \$ 39,327.68



HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032122
DATE: 01/13/2023

CLIENT NAME: U.S. Sugar Corporation

BILLING ATTORNEY: WALTER ANDREWS

IMPORTANT MESSAGE: The Firm's fiscal year ends on March 31st. We would appreciate having your outstanding invoices paid on or before that date. If you need further information to process our invoices, please let us know. Please follow the remittance instructions provided and contact us if you have any questions on expediting payment.

Thank you for your business and continued support of Hunton Andrews Kurth LLP.

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending December 31, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 100,957.60
Current Charges:	0.00

CURRENT INVOICE AMOUNT DUE:	\$ 100,957.60
------------------------------------	----------------------

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To Pay By Mail:
HUNTON ANDREWS KURTH LLP
PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: [REDACTED]
ABA Transit: [REDACTED]
Swift Code (International): [REDACTED]

Information with Wire: File: 054740.0000016, Inv: 114032122, Date: 01/13/2023



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EIN 54-0572269

INVOICE SUMMARY-REMITTANCE PAGE

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032122
DATE: 01/13/2023

CLIENT NAME: U.S. Sugar Corporation

BILLING ATTORNEY: WALTER ANDREWS

IMPORTANT MESSAGE: The Firm's fiscal year ends on March 31st. We would appreciate having your outstanding invoices paid on or before that date. If you need further information to process our invoices, please let us know. Please follow the remittance instructions provided and contact us if you have any questions on expediting payment.

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Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending December 31, 2022 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 100,957.60
Current Charges:	0.00

CURRENT INVOICE AMOUNT DUE: \$ 100,957.60

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ATLANTA, GA 30384-5759

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Swift Code (International): [REDACTED]
Information with Wire: File: 054740.0000016, Inv: 114032122, Date: 01/13/2023



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EIN 54-0572269

INVOICE DETAIL

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032122
DATE: 01/13/2023

CLIENT NAME: U.S. Sugar Corporation

BILLING ATTORNEY: WALTER ANDREWS

IMPORTANT MESSAGE: The Firm's fiscal year ends on March 31st. We would appreciate having your outstanding invoices paid on or before that date. If you need further information to process our invoices, please let us know. Please follow the remittance instructions provided and contact us if you have any questions on expediting payment.

Thank you for your business and continued support of Hunton Andrews Kurth LLP.

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH DECEMBER 31, 2022:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
12/01/2022	W ANDREWS	Review discovery strategy in response to AIG discovery requests, including deposition notices.	0.50
12/01/2022	J L HUCKABA	Evaluate strategy for responding to written discovery requests, including the insurer's requests for production and set of interrogatories.	0.70
12/01/2022	C D STEKLOF	Communicate with Mr. Andrews regarding case strategy and issues related to discovery (.5); communicate with Ms. Huckaba regarding case background and drafting of responses to written discovery and compile materials for her review (1.0); review AIG deposition notice and draft correspondence to client regarding same (.4); analyze discovery served by AIG to consider own discovery for service (1.2).	3.10
12/02/2022	W ANDREWS	Review and supplement draft discovery requests; review decision on motion for summary judgment on the pleadings and consider next steps.	1.00
12/02/2022	C D STEKLOF	Draft requests for production, interrogatories, and deposition notice and serve same on AIG (3.0); review discovery requests from AIG and strategize on responses to same (1.0); review order from Court granting Motion for Judgment on the Pleadings and draft correspondence to client regarding same (1.6).	5.60
12/04/2022	J L HUCKABA	Evaluate strategy for responding to written discovery, including requests for production and interrogatories.	2.20

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114032122
 DATE: 01/13/2023
 PAGE: 4

DATE	TIMEKEEPER	DESCRIPTION	HOURS
12/04/2022	C D STEKLOF	Analyze various issues related to upcoming discovery and production and exchange correspondence regarding same	0.60
12/05/2022	V CHAPUNOFF	Analyze next steps in connection with redacting invoices and preparing said invoices for production to Defendant.	0.50
12/05/2022	J L HUCKABA	Evaluate strategy for responding to written discovery, including reviewing order for partial judgment on the pleadings.	0.30
12/05/2022	C D STEKLOF	Communicate with Mr. Andrews regarding next steps in connection with discovery and litigation (.5); coordinate review and redaction of invoices for production and address issues related to deposition scheduling and discovery (1.0).	1.50
12/06/2022	W ANDREWS	Conference call with Mr. Kurtz and Mr. Schwinghammer regarding litigation strategy and follow up regarding discovery requests.	0.70
12/06/2022	V CHAPUNOFF	Create search terms for identifying confidential information on invoices to redact, and prepare document production of said invoices to Defendant.	0.80
12/06/2022	C D STEKLOF	Call with client regarding Court order and next steps in connection with discovery (1.0); analyze issues related to discovery going forward (.7).	1.70
12/07/2022	W ANDREWS	Review discovery and settlement strategy.	0.80
12/07/2022	C D STEKLOF	Analyze written discovery from AIG and outline necessary objections and responses in connection with same (1.5); address various issues related to discovery and scheduling of depositions (.3).	1.80
12/08/2022	W ANDREWS	Review discovery strategy.	0.80
12/08/2022	V CHAPUNOFF	Identify and redact confidential information on invoices in preparation for document production to Defendant.	3.50
12/08/2022	J L HUCKABA	Analyze documents and communications to respond to interrogatories and requests for production.	0.40
12/08/2022	J L HUCKABA	Analyze interrogatories and requests for production to determine the appropriate objections.	0.50
12/08/2022	C D STEKLOF	Analyze various issues related to written discovery responses (.5); address various issues regarding redaction of invoices for production (.4); exchange various correspondence regarding 30(b)(6) depositions, mediation, and various issues related to discovery (1.6).	2.50
12/09/2022	W ANDREWS	Review strategy regarding expert witnesses.	0.70

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114032122
 DATE: 01/13/2023
 PAGE: 5

DATE	TIMEKEEPER	DESCRIPTION	HOURS
12/09/2022	V CHAPUNOFF	Identify and redact confidential information on invoices in preparation for document production to Defendant.	5.30
12/09/2022	V CHAPUNOFF	Review and revise invoice tracking spreadsheet and send to client for collection of proof of payments.	0.50
12/09/2022	J L HUCKABA	Draft responses to interrogatories, including specific objections and directions to requests for production as permitted by Federal Rule of Civil Procedure 33(d).	3.90
12/09/2022	C D STEKLOF	Review initial draft of interrogatory responses and communicate with Ms. Huckaba regarding same (.8); exchange various correspondence regarding potential expert testimony(.3); analyze issues with deposition topics identified by AIG, confer with opposing counsel regarding same, and outline potential follow up (2.0).	3.10
12/12/2022	W ANDREWS	Work on discovery and expert strategy.	1.00
12/12/2022	V CHAPUNOFF	Identify and redact confidential information on invoices in preparation for document production to Defendant.	2.30
12/12/2022	J L HUCKABA	Draft responses to opposing counsel's first set of requests for production, including objections to the instructions and objections to specific requests.	6.00
12/12/2022	C D STEKLOF	Analyze issues related to discovery and review analysis regarding redactions of invoices for production	0.80
12/13/2022	W ANDREWS	Work on discovery responses and experts.	1.00
12/13/2022	V CHAPUNOFF	Identify and redact confidential information on invoices in preparation for document production to Defendant, and analyze next steps in connection with same.	1.30
12/13/2022	J L HUCKABA	Draft responses to requests for production and interrogatories, incorporating underlying counsel's responses the requests.	1.40
12/13/2022	J L HUCKABA	Draft joint proposed stipulated discovery confidentiality order, as is necessary prior to responding to opposing counsel's requests for production and interrogatories.	1.50
12/13/2022	C D STEKLOF	Review information provided by Mr. Schwinghamer related to AIG's written discovery and address various issues related to written responses, protective order, and potential expert	1.70
12/14/2022	V CHAPUNOFF	Identify and redact confidential information on invoices in preparation for document production to Defendant.	4.00

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114032122
 DATE: 01/13/2023
 PAGE: 6

DATE	TIMEKEEPER	DESCRIPTION	HOURS
12/14/2022	J L HUCKABA	Draft joint proposed stipulated discovery confidentiality order, as is necessary prior to responding to opposing counsel's requests for production and interrogatories.	0.20
12/14/2022	C D STEKLOF	Communicate with potential expert witness on fees and draft correspondence regarding same (1.0); draft and revise objections and answers to AIG's first set of requests for production (5.7).	6.70
12/15/2022	W ANDREWS	Review expert witness strategy.	0.50
12/15/2022	V CHAPUNOFF	Identify and redact confidential information on invoices in preparation for document production to Defendant.	3.30
12/15/2022	J L HUCKABA	Evaluate strategy for revising responses to requests for production and interrogatories, including determining follow up questions for counsel in the underlying Coffie litigation.	0.30
12/15/2022	C D STEKLOF	Draft and revise objections and responses to AIG's interrogatories and requests for production and communicate with Ms. Huckaba regarding finalizing same	3.90
12/16/2022	W ANDREWS	Review expert strategy.	0.30
12/16/2022	J L HUCKABA	Review and revise responses to requests for production and interrogatories.	0.70
12/16/2022	C D STEKLOF	Revise and finalize written discovery responses for review by client	2.00
12/18/2022	C D STEKLOF	Exchange correspondence regarding objections and responses to AIG's written discovery	0.30
12/20/2022	J L HUCKABA	Draft and revise responses to opposing counsel's interrogatories, incorporating answers regarding which firms represented the various defendants in the underlying action, as provided by underlying counsel.	0.40
12/20/2022	J L HUCKABA	Analyze local rules for the Southern District of Florida to determine whether a deponent can be required to sit for a deposition within the Southern District.	0.40
12/20/2022	J L HUCKABA	Draft and revise responses to opposing counsel's first set of requests for production, incorporating joint defense agreements and arrangements for other defendants in the underlying litigation to pay defense costs.	0.90

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114032122
 DATE: 01/13/2023
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
12/20/2022	C D STEKLOF	Draft and revised responses to written discovery propounded by AIG and coordinate various issues related to document production (2.8); communicate with mediator regarding initial questions related to matter and compile materials for mediator's review (.8); communicate with potential fee expert regarding background and involvement in matter (1.0).	4.60
12/21/2022	W ANDREWS	Review expert issues; review draft discovery responses.	1.50
12/21/2022	V CHAPUNOFF	Analyze information sent to and from client from December 18, 2022 through December 21, 2022, regarding responses to AIG's written discovery, potential engagement of expert, and proof of payments for invoices to be submitted to AIG, analyze proof of payments, supplement invoice tracking chart to reflect proof of payments, and identify and analyze documents received from Gunster.	4.70
12/21/2022	J L HUCKABA	Prepare and serve responses to opposing counsel's requests for production and interrogatories, including preparing the verification statement for opposing counsel's interrogatories.	0.70
12/21/2022	C D STEKLOF	Finalize written objections and responses to AIG's written discovery, coordinate service of same, and address issues related to retention of fee expert	2.30
12/22/2022	V CHAPUNOFF	Analyze proof of payments received from client on December 21, 2022, prepare correspondence to client identifying missing proof of payments and issues with said payments, and supplement invoice tracking chart to reflect same.	4.30
12/22/2022	C D STEKLOF	Communicate regarding review of documents for production and exchange correspondence regarding mediator engagement	0.40
12/23/2022	V CHAPUNOFF	Analyze information sent to fee expert S. Hawkins, and prepare documents for delivery to Mr. Hawkins via FTP site.	0.50
12/23/2022	C D STEKLOF	Exchange correspondence with opposing counsel regarding protective order (.4); coordinate various issues related to document production and review of materials by fee expert to compile report (.9).	1.30
12/25/2022	C D STEKLOF	Exchange correspondence regarding pre-mediation call with mediator and analyze upcoming tasks related to discovery	0.20
12/26/2022	W ANDREWS	Prepare for and participate in conference call with mediator.	0.80

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114032122
 DATE: 01/13/2023
 PAGE: 8

DATE	TIMEKEEPER	DESCRIPTION	HOURS
12/26/2022	C D STEKLOF	Conduct pre-mediation calls with Mr. Andrews and mediator in preparation for session with AIG (.9); address various issues related to discovery going forward (.9).	1.80
12/27/2022	W ANDREWS	Work on mediation strategy.	0.80
12/27/2022	V CHAPUNOFF	Analyze next steps in connection with preparing invoice submission to insurers in preparation for mediation, and analyze correspondence to and from client regarding mediation preparation.	0.40
12/27/2022	V CHAPUNOFF	Analyze information and proof of payments received from client on December 27, 2022, and supplement invoice tracking chart to reflect updates.	0.90
12/27/2022	C D STEKLOF	Address various issues related to discovery, compilation of expert report on fees and costs, and forthcoming motion for partial summary judgment (2.0); review redacted attorney invoices for production to AIG and communicate regarding same (2.5).	4.50
12/28/2022	W ANDREWS	Review discovery strategy; outline mediation brief.	1.00
12/28/2022	V CHAPUNOFF	Analyze information and proof of payments received from client on December 28, 2022, and supplement invoice tracking chart to reflect updates.	0.20
12/28/2022	V CHAPUNOFF	Identify and redact confidential information on invoices, and prepare for submission to Defendant.	1.70
12/28/2022	J L HUCKABA	Evaluate strategy for researching issues to be addressed in motion for partial summary judgment, such as the insurer's obligation to cover pre-suit defense costs and the "mend the hold" doctrine.	0.90
12/28/2022	C D STEKLOF	Strategize in preparation for mediation with AIG and research necessary in connection with forthcoming motion for partial summary judgment (1.0); communicate with Ms. Huckaba regarding necessary research into covered fees and mend the hold doctrine (.5); communicate with Mr. Schwinghammer regarding issues related to work performed between 2015 and 2019 (1.0); communicate with Mr. Schwinghammer and expert witness regarding various issues to address in connection with report (1.0); address various issues related to discovery, depositions, and production of documents to AIG (1.3).	4.80
12/29/2022	W ANDREWS	Multiple calls and correspondence regarding mediation, discovery and invoice production; review results of legal research for implications on same.	2.50

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114032122
 DATE: 01/13/2023
 PAGE: 9

DATE	TIMEKEEPER	DESCRIPTION	HOURS
12/29/2022	V CHAPUNOFF	Modify invoice tracking chart to conform to expert S. Hawkins' request, and determine fees through and including April 30, 2015, to consider removing from damage model.	1.10
12/29/2022	J L HUCKABA	Analyze and research precedent on whether the insurer can be obligated to pay defense costs and expenses incurred before the lawsuit is filed under the "defense expenses" language of the policy at issue.	4.20
12/29/2022	C D STEKLOF	Review invoice redactions prior to production of same to AIG and communicate regarding various issues related to same (3.1); review correspondence from opposing counsel regarding potential postponement of mediation and communicate with Mr. Andrews and mediator regarding same (1.3); draft correspondence to opposing counsel regarding request to move mediation (.5); draft and revise mediation statement for review and approval by client (4.7).	9.60
12/30/2022	W ANDREWS	Review coverage memorandum regarding trigger and allocation in preparation for mediation; review draft mediation statement; review strategy regarding production of defense invoices and review legal research re same.	3.00
12/30/2022	V CHAPUNOFF	Modify invoice tracking chart to conform to expert S. Hawkins' second request.	1.20
12/30/2022	V CHAPUNOFF	Identify and redact confidential information on invoices, and prepare said invoices and proof of payments for submission to AIG via FTP site.	2.70
12/30/2022	C D STEKLOF	Complete review of redacted invoices for production to AIG, exchange correspondence with client regarding same, and draft correspondence to opposing counsel regarding production of same under mediation privilege (1.5); review and finalize proposed confidentiality order to be entered by court and provide same to opposing counsel (.8); communicate with Mr. Andrews and Mr. Schwinghammer regarding invoices to be included within damage model (1.0); revise and finalize mediation statement for mediator (.7).	4.00
TOTAL HOURS			150.50

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114032122
DATE: 01/13/2023
PAGE: 10

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	16.90	1,112.00	18,792.80
C D STEKLOF	Counsel	68.80	833.00	57,310.40
J L HUCKABA	Associate	25.60	536.00	13,721.60
V CHAPUNOFF	Paralegal	39.20	284.00	11,132.80
TOTAL FEES (\$)				100,957.60

INVOICE SUMMARY:

Current Fees: \$ 100,957.60

Current Charges: 0.00

CURRENT INVOICE AMOUNT DUE: \$ 100,957.60



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EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032331
DATE: 02/10/2023

CLIENT NAME: U.S. Sugar Corporation

BILLING ATTORNEY: WALTER ANDREWS

IMPORTANT MESSAGE: The Firm's fiscal year ends on March 31st. We would appreciate having your outstanding invoices paid on or before that date. If you need further information to process our invoices, please let us know. Please follow the remittance instructions provided and contact us if you have any questions on expediting payment.

Thank you for your business and continued support of Hunton Andrews Kurth LLP.

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending January 31, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 237,829.20
Current Charges:	0.00

CURRENT INVOICE AMOUNT DUE: \$ 237,829.20

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114032122	0000016	01/13/2023	100,957.60

Outstanding Balance (for matter(s) on this invoice): 100,957.60

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 338,786.80

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Information with Wire: File: 054740.0000016, Inv: 114032331, Date: 02/10/2023



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INVOICE SUMMARY-REMITTANCE PAGE

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032331
DATE: 02/10/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

IMPORTANT MESSAGE: The Firm's fiscal year ends on March 31st. We would appreciate having your outstanding invoices paid on or before that date. If you need further information to process our invoices, please let us know. Please follow the remittance instructions provided and contact us if you have any questions on expediting payment.

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Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending January 31, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 237,829.20
Current Charges:	0.00

CURRENT INVOICE AMOUNT DUE: \$ 237,829.20

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114032122	0000016	01/13/2023	100,957.60

Outstanding Balance (for matter(s) on this invoice): 100,957.60

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 338,786.80

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Information with Wire: File: 054740.0000016, Inv: 114032331, Date: 02/10/2023



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INVOICE DETAIL

U.S. Sugar Corporation
ATTN: Luke Kurtz
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Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032331
DATE: 02/10/2023

CLIENT NAME: U.S. Sugar Corporation

BILLING ATTORNEY: WALTER ANDREWS

IMPORTANT MESSAGE: The Firm's fiscal year ends on March 31st. We would appreciate having your outstanding invoices paid on or before that date. If you need further information to process our invoices, please let us know. Please follow the remittance instructions provided and contact us if you have any questions on expediting payment.

Thank you for your business and continued support of Hunton Andrews Kurth LLP.

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH JANUARY 31, 2023:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/01/2023	J L HUCKABA	Analyze and research precedent on the "mend the hold" doctrine in the Court of Appeals for the Eleventh Circuit, the Florida First District Court of Appeal, the Florida Third District Court of Appeal, and the Southern District of Florida.	2.90
01/02/2023	C D STEKLOF	Exchange various correspondence regarding joint notice to court on jurisdiction and expert report (1.0); analyze documents to be compiled for production to AIG and draft correspondence regarding same (.8); communicate with fee expert regarding content of report (.6); analyze various issues related to discovery, expert disclosures, and upcoming litigation tasks (1.8).	4.20
01/03/2023	W ANDREWS	Telephone call with fee expert; review strategy regarding report; supplement two drafts of report; review and respond to correspondence from AIG counsel regarding discovery; exchange correspondence with client regarding same; review discovery response strategy for US Sugar; review documents in preparation for Mr. Kurtz's deposition.	5.00
01/03/2023	V CHAPUNOFF	Identify and prepare documents for production to Defendant.	1.70

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114032331
 DATE: 02/10/2023
 PAGE: 2

DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/03/2023	V CHAPUNOFF	Identify and prepare sample expert disclosures, analyze next steps in connection with serving S. Hawkins expert report and expert disclosures, create charts for use as exhibits in said report, and prepare aforementioned documents for delivery to Defendant via FTP site.	1.80
01/03/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel on January 2, 2023 and January 3, 2023, regarding preparing Joint Notice Regarding Magistrate Jurisdiction, 30(b)(6) deposition, mediation, and discovery matters.	0.20
01/03/2023	V CHAPUNOFF	Supplement invoice tracking chart to reflect invoice and proof of payment submission on December 30, 2022.	0.30
01/03/2023	J L HUCKABA	Analyze and research precedent on the "mend the hold" doctrine in the Southern District of Florida and the Middle District of Florida.	1.80
01/03/2023	J L HUCKABA	Evaluate strategy for advancing arguments based on the "mend the hold" doctrine in light of updated Florida case law.	0.20
01/03/2023	C D STEKLOF	Draft correspondence to opposing counsel regarding U.S. Sugar's opposition to extensions of remaining litigation deadlines (.7); review draft expert reports and conduct numerous calls with expert, Mr. Schwinghammer, and Mr. Andrews regarding necessary revisions to same and additional material to incorporate (6.5); draft and revise expert disclosures to accompany expert report (.6); coordinate service of expert report and disclosures to AIG (.5).	8.30
01/04/2023	W ANDREWS	Conference call with Mr. Kurtz regarding litigation and mediation strategy; review pleadings and legal research regarding same; review AIG motion for extension of discovery deadlines.	2.50
01/04/2023	V CHAPUNOFF	Identify and prepare documents for production to Defendant.	0.60
01/04/2023	J L HUCKABA	Evaluate strategy for analyzing the four possible theories that apply to trigger coverage under insurance policies in order to determine the trigger theory that would apply to the current policy.	0.20
01/04/2023	C D STEKLOF	Communicate with client regarding litigation strategy going forward (.6); address issues related to expert production and documents provided (.4); review AIG's motion to extend all remaining deadlines by 90 days (.9).	1.90

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114032331
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/05/2023	W ANDREWS	Outline arguments in response to motion for extension of deadlines; review and outline response to correspondence from AIG regarding US Sugar discovery responses; review US Sugar discovery responses and consider next steps in light of same.	1.50
01/05/2023	V CHAPUNOFF	Download Defendant's discovery responses, privilege log and document production received on January 5, 2023, and prepare for input into databases.	0.40
01/05/2023	V CHAPUNOFF	Analyze docket entries 40-45 related to status report, mediation, Plaintiff's motion for judgment on the pleadings and Defendant's motion to amend scheduling order, and supplement court pleadings index to reflect same.	0.30
01/05/2023	C D STEKLOF	Analyze appropriate response to AIG's motion to extend remaining deadlines and trial by 90 days (.7); outline and draft opposition to motion for extension (8.4).	9.10
01/06/2023	V P ADAMS	Analyze research under Florida law regarding whether challenges to responses or objections to discovery requests are waived if not raised before the discovery deadline.	2.30
01/06/2023	W ANDREWS	Review past correspondence with insurer and pleadings in preparation for mediation; review insurer discovery responses and document production.	2.00
01/06/2023	V CHAPUNOFF	Identify and analyze client documents received on January 6, 2023, and create redaction log for production to Defendant.	3.60
01/06/2023	J L HUCKABA	Analyze and research precedent on the applicable trigger theory under Florida law to develop duty to defend arguments for motion for summary judgment.	5.70
01/06/2023	C D STEKLOF	Draft opposition to AIG's motion to extend remaining deadlines and trial	4.40
01/07/2023	C D STEKLOF	Draft opposition to AIG's motion to extend remaining deadlines and trial	1.50
01/08/2023	W ANDREWS	Review and supplement draft brief in opposition to motion for continuance.	1.00
01/08/2023	C D STEKLOF	Draft and revise opposition to AIG's motion to extend remaining deadlines and trial	3.60
01/09/2023	W ANDREWS	Review and comment on strategy for opposition brief to motion to continue; review strategy regarding mediation; review AIG proposed changes to proposed confidentiality agreement.	2.00
01/09/2023	V CHAPUNOFF	Analyze information sent to and from client on January 9, 2023, regarding draft Opposition to AIG's Motion to Amend Scheduling Order and mediation.	0.20

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

INVOICE: 114032331
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/09/2023	V CHAPUNOFF	Download documents produced by Defendant on January 6, 2023, prepare said documents for input into databases, prepare privilege/redaction log and documents for production to Defendant, and create document production log.	2.00
01/09/2023	J L HUCKABA	Evaluate strategy for analyzing case law on Florida law's requirement that an insurer who has a duty to defend is required to defend a lawsuit in its entirety.	0.40
01/09/2023	C D STEKLOF	Revise and finalize opposition to AIG's motion to extend remaining deadlines and trial (3.1); compile exhibits to opposition and coordinate filing of same (.6); review materials in preparation for mediation with insurers (1.0); address various issues related to discovery and upcoming production (.4).	5.10
01/10/2023	W ANDREWS	Prepare for (including outline of issues to include in opening presentation) and attend mediation and meet with client regarding same and case strategy; review motion strategy; review draft mediation report to court.	7.50
01/10/2023	V CHAPUNOFF	Identify and prepare information pertaining to invoice matters for use at mediation.	0.30
01/10/2023	V CHAPUNOFF	Perform searches for civil remedy notices files by AIG and each of its subsidiaries and create chart outlining same for use at mediation.	1.10
01/10/2023	C D STEKLOF	Prepare for and attend mediation with AIG (6.5); analyze next steps in light of failure to settle (1.0).	7.50
01/11/2023	W ANDREWS	Review updated legal research as to Florida trigger law as to the duty to defend; review court ruling on AIG motion for continuance and consider next steps; review results of meet and confer with AIG on discovery disputes and draft confidentiality order; [REDACTED]	4.00
01/11/2023	V CHAPUNOFF	Identify and analyze client documents received on January 9, 2023 through January 11, 2023, and prepare for input into databases.	0.30
01/11/2023	V CHAPUNOFF	Analyze next steps in connection with identifying documents to be produced to AIG, including call with client to discuss same.	1.00
01/11/2023	J L HUCKABA	Draft email analyzing the whether the insurer must defend under the policy the insured chose to invoke.	0.20
01/11/2023	J L HUCKABA	Analyze precedent on insurer's obligation to pay all defense costs once the insurer's duty to defend is triggered under the policy.	1.60

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
 FILE NUMBER: 054740.0000016

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 DATE: 02/10/2023
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/11/2023	J L HUCKABA	Research precedent on an insurer's obligation to defend the entirety of a lawsuit where the insurer's policy is triggered regardless of whether other policies were in effect.	1.10
01/11/2023	J L HUCKABA	Analyze judge's order denying opposing counsel's motion to reopen discovery and extend remaining deadlines.	0.30
01/11/2023	J L HUCKABA	Evaluate strategy for amending responses to opposing counsel's discovery requests.	0.40
01/11/2023	C D STEKLOF	Review spreadsheet from client regarding past payments from CoOp and communicate with Ms. Rush and Ms. Chapunoff regarding issues to address with same and backup to locate (1.4); review order from Court denying AIG's motion for extension and draft update to team in connection with same (1.0); conduct meet and confer with opposing counsel regarding U.S. Sugar's discovery responses and analyze potential revisions to responses (1.5); draft correspondence regarding issue to address to finalize confidentiality order with AIG (.7); address various issues related to offensive and defensive discovery, additional documents for production, and next steps in connection with litigation (1.1).	5.70
01/12/2023	W ANDREWS	Review AIG discovery responses to determine compliance; review strategy regarding confidentiality order.	1.00
01/12/2023	V CHAPUNOFF	Analyze information and expert invoices spreadsheet received from client, prepare detailed correspondence to client identifying issues with information on said spreadsheet, and revise invoice tracking chart and draft document production to reflect striking of Waterkeeper-related invoice.	3.60
01/12/2023	J L HUCKABA	Analyze precedent on whether a party is required to produce documents already in the opposing party's possession under Florida law.	0.80
01/12/2023	J L HUCKABA	Review magistrate judge's standing discovery order to prepare amended discovery responses.	0.60

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 FILE NUMBER: 054740.0000016

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 DATE: 02/10/2023
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/12/2023	C D STEKLOF	Draft correspondence to opposing counsel to finalize content of confidentiality order (.5); analyze issues related to filing of confidentiality order with Court, draft notice to accompany same, coordinate filing, and draft correspondence to magistrate judge (1.6); exchange various correspondence regarding scheduling of 30(b)(6) depositions (.5); analyze issues related to missing invoice backup for production to AIG (.5); review additional documents for production to AIG and those to be withheld (1.4); analyze issues related to privilege log for production and draft correspondence to team regarding same (1.4).	5.90
01/13/2023	W ANDREWS	Review discovery issues; review possible summary judgment arguments on the duty to defend issues; review legal research on duty to defend and attorney fees; review proposed compromises in response to AIG meet and confer and consider comments of Mr. Schwinghammer and Mr. Kurtz.	2.00
01/13/2023	V CHAPUNOFF	Analyze information, expert invoices spreadsheet, and additional invoices received from client, correspond with client, including call, identifying issues with information and invoices, and analyze next steps in connection with document production and privilege log to be submitted to Defendant.	5.10
01/13/2023	J L HUCKABA	Analyze magistrate judge's confidentiality order for substantive changes to the parties' proposed stipulated order.	0.10
01/13/2023	J L HUCKABA	Evaluate strategy for analyzing cases from Florida federal courts on the appropriateness of summary judgment on damage issues relating to the duty to defend.	0.40
01/13/2023	J L HUCKABA	Research precedent on whether there is a presumption of reasonableness for defense costs where the insurer denies coverage.	2.30
01/13/2023	J L HUCKABA	Analyze precedent on whether an insurer who refuses to defend can challenge the insured's firm selection and the reasonableness of fees incurred in the underlying litigation.	2.20
01/13/2023	C D STEKLOF	Communicate regarding issues related to finalizing production to AIG (.3); draft detailed analysis to client regarding recommendations involving disputed discovery requests from AIG and review responses to same (2.3).	2.60
01/14/2023	J L HUCKABA	Analyze precedent on grants of partial summary judgment in favor of policyholders on issues related to damages.	2.80

HUNTON ANDREWS KURTH LLP
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/15/2023	J L HUCKABA	Analyze precedent on grants of partial summary judgment to policyholders on fees owed in duty to defend cases.	1.50
01/17/2023	W ANDREWS	Review issues regarding AIG discovery dispute and supplemental document production by US Sugar.	0.80
01/17/2023	V CHAPUNOFF	Analyze information received from client regarding discovery matters, revise draft document production and privilege log, and analyze next steps in connection with same.	5.20
01/17/2023	J L HUCKABA	Evaluate strategy for amending responses to discovery requests according to magistrate judge's standing order.	0.80
01/17/2023	J L HUCKABA	Evaluate strategy for analyzing precedent on whether policies and communications with other insurers are discoverable in discovery disputes.	0.20
01/17/2023	J L HUCKABA	Analyze magistrate judge's standing discovery order to determine whether opposing counsel's scheduling of a discovery hearing is proper.	0.80
01/17/2023	C D STEKLOF	Draft detailed correspondence to client and team regarding additional investigation in connection with amended discovery responses and issues to address (1.5); analyze necessary amendments to written discovery responses (1.0); draft correspondence to AIG regarding improper attempt to set discovery hearing with magistrate (1.2).	3.70
01/18/2023	W ANDREWS	Review and respond to correspondence from AIG regarding discovery complaints; work on US Sugar discovery responses.	1.50
01/18/2023	V CHAPUNOFF	Analyze information regarding discovery matters, expert invoices spreadsheet, and documents received from client, revise draft document production and privilege log, and analyze next steps in connection with same.	4.30
01/18/2023	J L HUCKABA	Review email from opposing counsel in response to our position that scheduling a discovery hearing is improper at this time.	0.30
01/18/2023	J L HUCKABA	Analyze whether a policyholder must produce policies from other insurers and documents and communications relating to requests for coverage from other insurers.	2.40

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 CLIENT NAME: U.S. Sugar Corporation
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/18/2023	C D STEKLOF	Analyze next steps in connection with amendments to written discovery responses and potential production of additional documents (1.0); address various issues related to client's collection of additional documents for production and coordinate call to address same (1.0); review final privilege log and documents for production to insurers and coordinate service of discovery to AIG (1.3); address various issues related to discovery and depositions going forward (.7).	4.00
01/19/2023	W ANDREWS	Review strategy regarding US Sugar discovery responses; review strategy regarding meet and confer on deficiencies in AIG discovery responses; review research [REDACTED].	2.00
01/19/2023	V CHAPUNOFF	Analyze information, expert invoices spreadsheet and documents received from client, attend conference call with counsel and client in connection with same, prepare documents produced by USSC on January 18, 2023 for input into database, and supplement invoice tracking chart to reflect said production.	3.40
01/19/2023	J L HUCKABA	Analyze conference notes and materials to [REDACTED]	1.50
01/19/2023	C D STEKLOF	Communicate with client regarding additional materials to be compiled for production (.6); analyze AIG's written discovery responses and annotate same in preparation for meet and confer with opposing counsel (1.5); communicate with Mr. Andrews regarding issues related to discovery and privilege log (.6); meet and confer with opposing counsel and draft notes regarding next steps (1.1); analyze research related to various discovery and [REDACTED] to be used in connection with discovery disputes and summary judgment briefing (1.3).	5.10
01/20/2023	W ANDREWS	Review AIG summary judgment motion and consider arguments in response; review potential dispute as to AIG document production and privilege log; review issues as to US Sugar discovery responses.	3.00
01/20/2023	V CHAPUNOFF	Analyze docket entries 46-50 related to Defendant's expedited motion to amend scheduling order and continue trial, mediator's report, and confidentiality order, and supplement court pleadings index to reflect same.	0.40
01/20/2023	V CHAPUNOFF	Supplement invoice tracking chart to reflect information on new invoices provided by client, and send said chart to client.	0.90

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/20/2023	J L HUCKABA	Evaluate strategy for next steps relating to researching [REDACTED]	0.10
01/20/2023	J L HUCKABA	Review defendant's motion for partial summary judgment.	0.40
01/20/2023	J L HUCKABA	Review underlying counsel's recommendations on how to amend responses to opposing counsel's requests for production.	0.30
01/20/2023	C D STEKLOF	Exchange various correspondence regarding discovery issues, amendments to written discovery responses, and deposition scheduling going forward	1.00
01/22/2023	J L HUCKABA	Review correspondence on next steps for amending discovery responses based on underlying counsel's opinion on documents to be produced.	0.10
01/22/2023	C D STEKLOF	Analyze various correspondence relating to amendment of written discovery responses and exchange correspondence regarding same (.8); address various issues related to expert deposition scheduling and discovery issues (.5); review and analyze AIG's motion for partial summary judgment and annotate same for opposition (1.6).	2.90
01/23/2023	W ANDREWS	Outline arguments in response to AIG summary judgment motion; review developments and strategy regarding client search for responsive documents and discovery responses; outline objections to same.	3.00
01/23/2023	V CHAPUNOFF	Analyze information sent to and from client on January 20, 2023 and January 23, 2023 regarding AIG's motion for summary judgment.	0.20
01/23/2023	V CHAPUNOFF	Analyze information regarding discovery matters and documents received from client on January 20, 2023.	2.30
01/23/2023	V CHAPUNOFF	Review and prepare for database Defendant's amended corporate representative deposition notice.	0.10
01/23/2023	J L HUCKABA	Review responses from client's director of risk management to amend responses to discovery requests.	0.10
01/23/2023	J L HUCKABA	Analyze arguments in insurer's motion for partial summary judgment to determine issues to research and address in the response.	0.60
01/23/2023	J L HUCKABA	Draft amended responses to interrogatories, incorporating opposing counsel's clarifications of the requests and the magistrate judge's standing discovery procedures.	2.90
01/23/2023	J L HUCKABA	Draft email to counsel in underlying litigation regarding the correspondence on the allocation and payment of defense costs.	0.40

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/23/2023	J L HUCKABA	Draft email regarding strategy for objecting to requests for production and including supporting case law within responses to requests for production.	1.10
01/23/2023	J L HUCKABA	Draft amended responses to the insurer's requests for production, incorporating information provided by underlying counsel and the rules for discovery set out in the magistrate judge's standing discovery order.	2.60
01/23/2023	C D STEKLOF	Communicate with Mr. Andrews regarding strategy for opposition to AIG's summary judgment motion and amended discovery responses (.8); communicate with Ms. Huckaba regarding revisions to written discovery responses (.6); review outstanding issues in connection with revisions and provide comments to same (.7); review statement of facts in support of AIG's summary judgment motion, exhibits to same, and relevant Florida authority regarding trigger theories under CGL policies (4.9).	7.00
01/24/2023	W ANDREWS	Continue working on discovery responses.	0.80
01/24/2023	J L HUCKABA	Revise responses to requests for production and interrogatories to include language from the court's orders and objections for relevance.	3.40
01/24/2023	J L HUCKABA	Analyze opinions and orders issued by Magistrate Judge Goodman in discovery disputes to determine the appropriate balance between relevancy and burden.	1.50
01/24/2023	J L HUCKABA	Evaluate strategy for comparing the policy issued to the client for the 2014 to 2015 policy year to the policy issued for the 2015 to 2016 policy year.	0.20
01/24/2023	J L HUCKABA	Evaluate strategy for argument in response to insurer's motion for partial summary judgment that regardless of which coverage trigger theory applies, there was a possibility of coverage that triggered the duty to defend.	0.20
01/24/2023	C D STEKLOF	Review and analyze research into various legal issues related to opposition to AIG's motion for partial summary judgment including various trigger theories, mend the hold doctrine, and cases cited by AIG	7.10
01/25/2023	W ANDREWS	Work on discovery responses.	1.00
01/25/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel regarding depositions, and create deposition calendar tracking chart.	0.40
01/25/2023	V CHAPUNOFF	Identify documents responsive to Defendant's discovery requests, and prepare supplemental document production to Defendant.	0.30

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/25/2023	J L HUCKABA	Revise final draft of responses to insurer's first set of interrogatories, including adding appropriate citations to legal authority.	1.00
01/25/2023	J L HUCKABA	Revise final draft of responses to insurer's first set of requests for production, including adding appropriate citations to legal authority and objections to request for documents concerning voluntary dismissal of the underlying litigation.	1.70
01/25/2023	J L HUCKABA	Draft email to client with revised drafts of responses to insurer's interrogatories and requests for production.	0.40
01/25/2023	C D STEKLOF	Revise amended responses to AIG's requests for production and interrogatories and communicate with Ms. Huckaba regarding same (2.5); review prior correspondence and amended complaints from underlying lawsuit in connection with opposition to summary judgment motion (3.0); draft opposition to AIG's motion for partial summary judgment (2.8).	8.30
01/26/2023	W ANDREWS	Review and supplement draft discovery responses.	1.00
01/26/2023	V CHAPUNOFF	Prepare supplemental document production to Defendant.	0.30
01/26/2023	J L HUCKABA	Evaluate strategy for responding to insurer's motion for summary judgment, including drafting responses to the attached statement of undisputed facts.	0.40
01/26/2023	J L HUCKABA	Draft final revisions of requests for production to send to client for approval.	1.00
01/26/2023	C D STEKLOF	Draft opposition to AIG's motion for partial summary judgment regarding introduction and law regarding duty to defend and trigger theories	6.70
01/27/2023	W ANDREWS	Prepare for Mr. Kurtz's deposition.	2.00
01/27/2023	J L HUCKABA	Analyze local rules for the southern district Florida to determine requirements for the statement of material facts.	0.60
01/27/2023	J L HUCKABA	Analyze and compare policies issued to the client for the 2014 to 2015 and 2015 to 2016 to determine differences in the language and endorsements.	0.90
01/27/2023	C D STEKLOF	Draft opposition to AIG's motion for partial summary judgment regarding Florida law on trigger theory and application of injury-in-fact and manifestation theories to present dispute	8.10
01/28/2023	C D STEKLOF	Draft opposition to AIG's motion for partial summary judgment regarding mend the hole doctrine and policy language governing ability to recover defense expenses prior to filing of underlying lawsuit	6.90

HUNTON ANDREWS KURTH LLP
 CLIENT NAME: U.S. Sugar Corporation
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/29/2023	C D STEKLOF	Draft opposition to AIG's motion for partial summary judgment regarding coverage for defense expenses prior to underlying lawsuit	1.00
01/30/2023	W ANDREWS	Meet with Mr. Kurtz to prepare for his deposition; conference call with Mr. Max (mediator) regarding settlement proposal and discuss same with Mr. Kurtz.	8.50
01/30/2023	V CHAPUNOFF	Identify and analyze invoices received from client on January 30, 2023, analyze next steps in connection with same, and prepare supplemental document production to Defendant.	1.50
01/30/2023	J L HUCKABA	Revise and prepare final drafts of amended responses to the insurer's requests for production and interrogatories for client's verification.	0.90
01/30/2023	J L HUCKABA	Evaluate strategy for finalizing requests for production and serving documents on opposing counsel.	0.50
01/30/2023	C D STEKLOF	Prepare client for 30(b)(6) deposition (7.3); communicate with mediator and Mr. Andrews regarding AIG settlement offer (.3); finalize and serve amended discovery responses and exchange various correspondence with opposing counsel regarding same (1.5).	9.10
01/31/2023	W ANDREWS	Defend Mr. Kurtz's deposition and follow up regarding questions asked; follow up regarding settlement offer; review and supplement draft brief in opposition to AIG summary judgment motion.	7.00
01/31/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel on January 30, 2023 regarding discovery and document production matters, prepare Plaintiff's January 30, 2023 document production for input into database, supplement invoice tracking chart to reflect invoices received from client on January 30, 2023, send expert S. Hawkins said invoices via FTP site, and identify and prepare for client delivery via FTP site invoices previously provided by client post mediation to possibly be produced in next production round.	3.00
01/31/2023	J L HUCKABA	Analyze and summarize local rules on oppositions to summary judgment motions, including formatting, attachments, and page limits.	1.10
01/31/2023	J L HUCKABA	Evaluate strategy for drafting opposition to insurer's statement of material facts.	0.20

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
01/31/2023	C D STEKLOF	Analyze various issues related to response to AIG's statement of facts and affidavit for Mr. Kurtz (.7); communicate with client and Mr. Andrews regarding 30(b)(6) deposition and next steps in connection with litigation (1.0); draft opposition to summary judgment motion regarding fees and expenses incurred before underlying lawsuit and revise same (4.4).	6.10
TOTAL HOURS			297.10

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	59.10	1,247.00	73,697.70
C D STEKLOF	Counsel	136.80	869.00	118,879.20
V P ADAMS	Associate	2.30	581.00	1,336.30
J L HUCKABA	Associate	54.10	536.00	28,997.60
V CHAPUNOFF	Paralegal	44.80	333.00	14,918.40
TOTAL FEES (\$)				237,829.20

INVOICE SUMMARY:

Current Fees:	\$ 237,829.20
Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 237,829.20

EXHIBIT A



HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032602
DATE: 03/31/2023

CLIENT NAME: U.S. Sugar Corporation

BILLING ATTORNEY: WALTER ANDREWS

IMPORTANT MESSAGE: The Firm's fiscal year ends on March 31st. We would appreciate having your outstanding invoices paid on or before that date. If you need further information to process our invoices, please let us know. Please follow the remittance instructions provided and contact us if you have any questions on expediting payment.

Thank you for your business and continued support of Hunton Andrews Kurth LLP.

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending February 28, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 132,772.90
Current Charges:	55.10

CURRENT INVOICE AMOUNT DUE:	\$ 132,828.00
------------------------------------	----------------------

TO RECEIVE PROPER CREDIT, PLEASE ATTACH REMITTANCE COPY WITH PAYMENT.

FOR BILLING INQUIRIES, PLEASE CALL: 804-788-8555

To Pay By Mail:
HUNTON ANDREWS KURTH LLP
PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: 001458094
ABA Transit: 061000104
Swift Code (International): SNTRUS3A
Information with Wire: File: 054740.0000016, Inv: 114032602, Date: 03/31/2023



HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE SUMMARY-REMITTANCE PAGE

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032602
DATE: 03/31/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

IMPORTANT MESSAGE: The Firm's fiscal year ends on March 31st. We would appreciate having your outstanding invoices paid on or before that date. If you need further information to process our invoices, please let us know. Please follow the remittance instructions provided and contact us if you have any questions on expediting payment.

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HUNTON ANDREWS KURTH LLP
PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: 001458094
ABA Transit: 061000104
Swift Code (International): SNTRUS3A
Information with Wire: File: 054740.0000016, Inv: 114032602, Date: 03/31/2023

HUNTON ANDREWS KURTH

HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE DETAIL

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032602
DATE: 03/31/2023

CLIENT NAME: U.S. Sugar Corporation

BILLING ATTORNEY: WALTER ANDREWS

IMPORTANT MESSAGE: The Firm's fiscal year ends on March 31st. We would appreciate having your outstanding invoices paid on or before that date. If you need further information to process our invoices, please let us know. Please follow the remittance instructions provided and contact us if you have any questions on expediting payment.

Thank you for your business and continued support of Hunton Andrews Kurth LLP.

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH FEBRUARY 28, 2023:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
02/01/2023	W ANDREWS	Continue work on opposition to summary judgment motion; review factual support for same; review strategy regarding expert deposition and AIG deposition; obtain settlement report from Mr. Max and consider next steps in light of same; discuss same with Mr. Kurtz.	4.00
02/01/2023	V CHAPUNOFF	Call with client to discuss invoice matters.	0.20
02/01/2023	J L HUCKABA	Draft opposition to insurer's statement of material facts pursuant to local rule 56(a).	1.10
02/01/2023	J L HUCKABA	Analyze expert report, correspondence to insurer regarding the notice of loss, initial disclosures, and responses to insurer's requests for production to draft opposition to statement of material facts.	2.00
02/01/2023	C D STEKLOF	Communicate with mediator and client regarding settlement discussions and draft correspondence to mediator regarding same (1.0); exchange correspondence with opposing counsel regarding ongoing discovery disputes (.7); draft opposition to summary judgment motion regarding summary of material facts and conclusion (2.0); revise opposition, incorporate revisions from Mr. Andrews, and review procedural requirements in connection with statement of facts and filing of exhibits (6.6).	10.30
02/02/2023	W ANDREWS	Work on opposition to summary judgment motion and Mr. Kurtz's affidavit in support of same; outline additional potential witness testimony.	2.00

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114032602
DATE: 03/31/2023
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
02/02/2023	V CHAPUNOFF	Analyze information and documents received from client on February 1, 2023, and information sent to and from opposing counsel on February 1, 2023, and supplement invoice tracking chart to reflect updates.	1.40
02/02/2023	J L HUCKABA	Evaluate strategy for drafting a motion requesting that the court grant client five days from the impasse on discovery issues to schedule a discovery hearing.	0.30
02/02/2023	J L HUCKABA	Draft motion requesting clarification of time to schedule discovery hearing in the event that disputes remain after the insurer serves its amended written discovery responses.	1.10
02/02/2023	J L HUCKABA	Draft final revisions to motion for clarification of magistrate's discovery protocol order.	0.60
02/02/2023	J L HUCKABA	Research precedent supporting the proposition that what constitutes a defense cost is a question for the jury to decide.	0.60
02/02/2023	C D STEKLOF	Draft and revise Kurtz affidavit in support of summary judgment opposition (2.0); draft and revise U.S. Sugar's responses to AIG's statement of facts (2.7); draft and revise U.S. Sugar's own statement of additional facts (2.6); analyze exhibits for filing with summary judgment opposition (1.5); review materials appropriate for notice of filing (1.5); analyze various procedural requirements in connection with filing summary judgment opposition (.7).	11.00
02/03/2023	W ANDREWS	Review AIG expert report and outline rebuttal to same; review and supplement draft statement of facts in opposition to AIG's statement submitted in support of its summary judgment motion; review strategy regarding responses to outstanding AIG discovery requests.	2.80
02/03/2023	V CHAPUNOFF	Analyze information and documents received from client on February 2, 2023, supplement invoice tracking chart to reflect updates, and prepare supplemental document production to Defendant.	5.50
02/03/2023	J L HUCKABA	Evaluate correspondence with opposing counsel regarding the insurer's amended responses to client's discovery requests.	0.20
02/03/2023	C D STEKLOF	Revise and finalize Kurtz affidavit in support of summary judgment opposition (1.5); revise and finalize U.S. Sugar's responses to AIG's statement of facts (1.5); revise and finalize U.S. Sugar's own statement of additional facts (1.0); revise notice of filing and review final exhibits for filing in connection with opposition (2.0); incorporate additional revisions to opposition from team (1.5); review final draft of opposition and incorporate final revisions to same (3.5); coordinate filing of opposition (.9).	11.90

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114032602
DATE: 03/31/2023
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
02/06/2023	W ANDREWS	Review strategy regarding Hawkins expert deposition preparation; research regarding Greenberg expert's own fees.	1.00
02/06/2023	V CHAPUNOFF	Prepare supplemental document production to Defendant.	2.00
02/06/2023	J L HUCKABA	Evaluate strategy for rebutting insurer's expert report on the reasonableness of fees incurred in the underlying lawsuit.	0.60
02/06/2023	K M RUDD	Search dockets in the Southern District of Florida to try and identify cases where Greenberg sought to recover attorneys' fees for its own work.	1.50
02/06/2023	C D STEKLOF	Address various issues related to filing of motion to address issues with AIG discovery (.5); coordinate gathering of research into Greenberg Traurig fee applications in connection with rebuttal expert report (1.0); exchange correspondence with opposing counsel regarding outstanding issues related to discovery (.7); address various issues related to case strategy, discovery, and scheduling of depositions (.8).	3.00
02/07/2023	W ANDREWS	Telephone call with Scott Hawkins regarding rebuttal to AIG expert report; review research regarding same; outline deposition strategy.	1.50
02/07/2023	V CHAPUNOFF	Prepare supplemental document production to Defendant via FTP site.	0.80
02/07/2023	J L HUCKABA	Analyze local and federal rules of civil procedure to determine the appropriate procedure for replying to an opposing party's expert rebuttal.	0.50
02/07/2023	J L HUCKABA	Draft revisions to motion for clarification to be filed with the court nunc pro tunc.	0.30
02/07/2023	J L HUCKABA	Analyze motions for attorneys fees by opposing counsel's expert witness's firm to determine inconsistencies in the expert report and actual fees charged by the expert.	1.40
02/07/2023	J L HUCKABA	Draft final revisions to motion for clarification of the magistrate judge's discovery procedure order nunc pro tunc.	0.60
02/07/2023	C D STEKLOF	Analyze issues related to rebuttal expert report and content of same (1.0); analyze filing of discovery motion regarding outstanding issues with AIG's written discovery (.5); address various issues related to additional documents for production and analyze various materials to be finalized for production to AIG (1.0); analyze expert report from AIG and communicate with Mr. Hawkins regarding content of rebuttal (1.8).	4.30

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
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DATE: 03/31/2023
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
02/08/2023	W ANDREWS	Review strategy regarding rebuttal expert report; review additional research re same; outline strategy regarding potential trial exhibits; review and respond to new approach from mediator; review new discovery responses from AIG following meet and confer; telephone call with Mr. Max regarding new settlement approach from AIG; telephone call with Mr. Kurtz regarding same.	4.00
02/08/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel on February 7, 2023 regarding depositions and document production matters, prepare USSC's February 7, 2023 document production for input into database, supplement invoice tracking chart to reflect said production and new invoices and proof of payments recently designated as related by client, identify missing information to request from client, and submit information request to client.	3.50
02/08/2023	V CHAPUNOFF	Call with attorneys to discuss preparing for trial and analyze next steps in connection with same.	0.60
02/08/2023	V CHAPUNOFF	Analyze docket entries 51-60 related to the parties' notices of filing summary judgment evidence, Plaintiff's motion for clarification, Defendant's statement of material facts, and Defendant's motion for partial summary judgment, and supplement court pleadings index to reflect same.	0.80
02/08/2023	J L HUCKABA	Analyze insurer's amended responses to plaintiff's interrogatories and requests for production to determine issues to raise with the magistrate judge.	1.30
02/08/2023	J L HUCKABA	Evaluate strategy for preparing for trial, including drafting a trial outline and finalizing exhibits.	0.80
02/08/2023	C D STEKLOF	Review court order regarding discovery motion and communicate with Mr. Andrews regarding same and next steps (.5); draft correspondence to mediator regarding request for settlement meeting (.4); communicate with mediator regarding potential settlement meeting, discuss same with client, and draft correspondence to mediator regarding meeting conditions (1.0); communicate with team regarding upcoming litigation tasks (.5); address various issues related to discovery (.8).	3.20
02/09/2023	W ANDREWS	Review expert witness strategy; review discovery regarding AIG discovery responses.	1.00
02/09/2023	V CHAPUNOFF	Download and prepare for database documents produced by Defendant on February 8, 2023, and supplement document production log to reflect updates.	0.50

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
02/09/2023	J L HUCKABA	Evaluate strategy for analyzing the fee information collected on the insurer's expert and [REDACTED].	0.70
02/09/2023	C D STEKLOF	Communicate with expert regarding rebuttal report (1.0); [REDACTED] (1.2); analyze additional research to undercut AIG fee expert opinions (.5); analyze various issues related to discovery, depositions, and next steps in connection with litigation (1.0).	3.70
02/10/2023	W ANDREWS	Multiple telephone calls with Mr. Kurtz and Mr. Steklof regarding AIG settlement negotiations and follow up regarding same; review AIG Reply Brief in support of Summary Judgment Motion and outline strategy regarding same.	2.50
02/10/2023	V CHAPUNOFF	Analyze email received from client regarding document collection matters and respond to same.	0.20
02/10/2023	V CHAPUNOFF	Call with counsel to discuss preparing spreadsheets listing total fees and costs Plaintiff (1) produced to and (2) is seeking from Defendant, and breakdown of said fees and costs during various time periods, analyze redacted invoices to perform calculations for amounts to be deducted from invoices (amounts Plaintiff is not seeking), and create said spreadsheet.	2.30
02/10/2023	J L HUCKABA	Analyze fee information collected on the insurer's expert and organize into chart for expert witness to use in rebuttal.	2.50
02/10/2023	J L HUCKABA	Analyze insurer's rebuttal expert disclosure and report.	0.50
02/10/2023	J L HUCKABA	Analyze briefings and memoranda filed in Florida courts on the reasonableness of fees.	1.20
02/10/2023	C D STEKLOF	Communicate with mediator regarding discussion with AIG and draft correspondence to team regarding same (.6); communicate with Mr. Andrews and client regarding same and appropriate response (.8); communicate with client regarding call with AIG (.3); communicate with Mr. Hawkins regarding content of rebuttal report and draft correspondence to team regarding same (.9); analyze various research issues in connection with reasonableness of fees and additional information from public records to discredit AIG's expert report (.9).	3.50
02/12/2023	C D STEKLOF	Review AIG's reply in support of motion for summary judgment and exchange correspondence regarding same	0.60

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DATE: 03/31/2023
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
02/13/2023	W ANDREWS	Review strategy regarding follow-up to AIG Reply Brief; work on Mr. Hawkins' rebuttal expert report.	1.50
02/13/2023	V CHAPUNOFF	Create spreadsheet listing total fees and costs Plaintiff (1) produced to and (2) is seeking from Defendant, breakdown said fees and costs during various time periods, and analyze redacted invoices to perform calculations for amounts to be deducted from invoices (amounts Plaintiff is not seeking).	3.40
02/13/2023	C D STEKLOF	Communicate with Mr. Andrews regarding AIG's reply on summary judgment motion and potential sur-reply to same (.7); exchange various correspondence regarding deposition scheduling (.4); analyze updated schedules reflecting total covered fees and costs incurred by client and analyze issues related to same for negotiation purposes (1.1).	2.20
02/14/2023	W ANDREWS	Review and outline settlement approach in response to meeting with AIG's claim adjuster; review issues regarding case management order timing; review and comment on Mr. Hawkins' draft rebuttal expert report.	2.50
02/14/2023	V CHAPUNOFF	Analyze next steps in connection with invoice calculations performed for potential settlement discussions, and review and respond to email from client regarding CoOp payment matters.	0.40
02/14/2023	V CHAPUNOFF	Prepare and serve supplemental document production to Defendant.	0.30
02/14/2023	J L HUCKABA	Analyze precedent on the reasonableness of attorney fees incurred where insurer breached its duty to defend and fees were paid by the insured in good faith.	3.40
02/14/2023	J L HUCKABA	Research precedent on the reasonableness of fees.	1.90
02/14/2023	C D STEKLOF	Analyze updated calculations of fees and costs incurred by U.S. Sugar and communicate with Ms. Chapunuoff regarding issues related to same (1.0); compile detailed analysis to client regarding same and recommendation in connection with ongoing settlement discussions with AIG (1.7); review analysis of case law related to reasonableness of fees incurred and issues related to same (.8).	3.50
02/15/2023	W ANDREWS	Conference call with Mr. Hawkins regarding his draft rebuttal expert report and revise and supplement same; conference call with Mr. Kurtz regarding settlement negotiations with AIG; telephone call with Mr. Max regarding same.	1.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
02/15/2023	V CHAPUNOFF	Download and prepare for databases transcript files for deposition of L. Kurtz, prepare and send Mr. Kurtz errata sheet instructions, and supplement deponent tracking log to reflect updates.	0.80
02/15/2023	J L HUCKABA	Evaluate strategy for researching Procaps line of precedent on the reasonableness of fees.	0.30
02/15/2023	J L HUCKABA	Research precedent following Procaps on the reasonableness of fees.	0.40
02/15/2023	C D STEKLOF	Review draft of expert rebuttal report and communicate with expert regarding necessary revisions (.1.2); communicate with client regarding settlement discussions with AIG (.5); analyze additional research necessary regarding reasonableness of fees incurred (.7).	2.40
02/16/2023	W ANDREWS	Telephone call with Mr. Max regarding settlement negotiations; review Mr. Kurtz's deposition transcript for possible corrections; identify follow-up regarding trial exhibits based on Mr. Kurtz's testimony.	2.80
02/16/2023	J L HUCKABA	Analyze precedent following Procaps on the reasonableness of fees.	1.10
02/16/2023	J L HUCKABA	[REDACTED]	1.10
02/16/2023	J L HUCKABA	[REDACTED]	2.00
02/16/2023	C D STEKLOF	Analyze status of negotiations with AIG and next steps (.2); review research regarding presumptive reasonableness of attorneys' fees under Florida law (.3).	0.50
02/17/2023	W ANDREWS	Review additional case law support for Mr. Hawkins' rebuttal report; review and comment on various versions of Mr. Hawkins' draft rebuttal report	3.00
02/17/2023	V CHAPUNOFF	Analyze draft rebuttal report of S. Hawkins and perform revised invoice calculations.	1.20
02/17/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel regarding depositions, and supplement deposition calendar chart to reflect updates.	0.20
02/17/2023	J L HUCKABA	Analyze treatises and law review articles on the reasonableness of fees incurred where the insurer breaches its duty to defend.	0.80
02/17/2023	C D STEKLOF	Review updated rebuttal expert report and incorporate proposed revisions to same	1.80
02/18/2023	C D STEKLOF	Communicate with expert in order to finalize rebuttal report	0.20

HUNTON ANDREWS KURTH LLP
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
02/20/2023	W ANDREWS	Review expert strategy.	0.50
02/20/2023	C D STEKLOF	Review final draft of rebuttal expert report and serve same on opposing counsel	0.30
02/21/2023	W ANDREWS	[REDACTED] [REDACTED] review possible areas of additional summary judgment briefing.	1.00
02/21/2023	V CHAPUNOFF	[REDACTED] [REDACTED] Analyze next steps in connection with preparing trial exhibits, supplement invoice tracking chart to reflect bates production numbers of proof of payments, and confirm payment amounts match invoice amounts.	0.80
02/21/2023	V CHAPUNOFF	Draft errata sheet for L. Kurtz.	1.70
02/21/2023	J L HUCKABA	[REDACTED] [REDACTED]	0.70
02/21/2023	J L HUCKABA	Review rebuttal report of expert Hawkins.	0.60
02/21/2023	J L HUCKABA	Evaluate strategy for identifying bills to be included in request for fees.	0.10
02/21/2023	C D STEKLOF	[REDACTED] [REDACTED]	1.00
02/22/2023	W ANDREWS	[REDACTED] [REDACTED]	0.50
02/22/2023	V CHAPUNOFF	Analyze information and documents received from client on February 21, 2023, and supplement invoice tracking chart to reflect updates.	1.60
02/22/2023	C D STEKLOF	Review 30(b)(6) deposition transcript	0.80
02/23/2023	V CHAPUNOFF	Analyze information and documents received from client on February 21, 2023, and supplement invoice tracking chart to reflect updates.	1.00
02/23/2023	J L HUCKABA	[REDACTED] [REDACTED]	2.00
02/23/2023	J L HUCKABA	[REDACTED] [REDACTED]	1.30
02/24/2023	W ANDREWS	[REDACTED] [REDACTED]	0.50
02/24/2023	V CHAPUNOFF	Identify information in connection with final pretrial conference.	0.10
02/24/2023	J L HUCKABA	[REDACTED] [REDACTED]	1.30

HUNTON ANDREWS KURTH LLP
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INVOICE: 114032602
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
02/24/2023	J L HUCKABA	[REDACTED]	2.20
02/24/2023	J L HUCKABA	[REDACTED]	1.40
02/24/2023	J L HUCKABA	[REDACTED]	1.40
02/24/2023	J L HUCKABA	[REDACTED]	0.70
02/25/2023	C D STEKLOF	Evaluate potential issues to address through motions in limine	0.20
02/26/2023	C D STEKLOF	Evaluate timing of 30(b)(6) and expert depositions	0.10
02/27/2023	W ANDREWS	Review litigation strategy.	0.50
02/27/2023	J L HUCKABA	Analyze recent precedent from the district courts of appeal on the recoverability of pre-suit fees.	0.30
02/27/2023	J L HUCKABA	[REDACTED]	1.20
02/27/2023	J L HUCKABA	[REDACTED]	1.70
02/27/2023	J L HUCKABA	[REDACTED]	0.70
02/27/2023	C D STEKLOF	Address issues related to deposition scheduling	0.20
02/28/2023	W ANDREWS	Review punitive damages strategy and legal research regarding same.	1.00
02/28/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel regarding depositions, coordinate deposition of Defendant's 30(b)(6) corporate representative, and supplement deposition calendar tracking chart to reflect updates.	0.30
02/28/2023	V CHAPUNOFF	Analyze information received from client on February 27, 2023, regarding invoice matters, and supplement invoice tracking chart to reflect updates.	0.40
02/28/2023	J L HUCKABA	[REDACTED]	1.40
02/28/2023	C D STEKLOF	Analyze next steps in connection with litigation and potential motions in limine	0.40
TOTAL HOURS			174.50

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114032602
DATE: 03/31/2023
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TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	33.60	1,247.00	41,899.20
C D STEKLOF	Counsel	65.10	869.00	56,571.90
J L HUCKABA	Associate	44.30	536.00	23,744.80
V CHAPUNOFF	Paralegal	30.00	333.00	9,990.00
K M RUDD	Librarian	1.50	378.00	567.00
TOTAL FEES (\$)				132,772.90

FOR COSTS ADVANCED AND EXPENSES INCURRED:

CODE	DESCRIPTION	AMOUNT
E106	Online Research	55.10
TOTAL CURRENT EXPENSES (\$)		55.10

INVOICE SUMMARY:

Current Fees:	\$ 132,772.90
Current Charges:	55.10
CURRENT INVOICE AMOUNT DUE:	\$ 132,828.00



HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032725
DATE: 04/26/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending March 31, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 222,796.40
Current Charges:	4,609.33
CURRENT INVOICE AMOUNT DUE:	\$ 227,405.73

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114032602	0000016	03/31/2023	132,828.00

Outstanding Balance (for matter(s) on this invoice): 132,828.00

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 360,233.73

TO RECEIVE PROPER CREDIT, PLEASE ATTACH REMITTANCE COPY WITH PAYMENT.

FOR BILLING INQUIRIES, PLEASE CALL: 804-788-8555

To Pay By Mail:
HUNTON ANDREWS KURTH LLP
PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: 001458094
ABA Transit: 061000104
Swift Code (International): SNTRUS3A
Information with Wire: File: 054740.0000016, Inv: 114032725, Date: 04/26/2023



HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE SUMMARY-REMITTANCE PAGE

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032725
DATE: 04/26/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending March 31, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 222,796.40
Current Charges:	4,609.33
CURRENT INVOICE AMOUNT DUE:	\$ 227,405.73

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114032602	0000016	03/31/2023	132,828.00

Outstanding Balance (for matter(s) on this invoice): 132,828.00

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 360,233.73

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To Pay By Mail:
HUNTON ANDREWS KURTH LLP
PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: 001458094
ABA Transit: 061000104
Swift Code (International): SNTRUS3A
Information with Wire: File: 054740.0000016, Inv: 114032725, Date: 04/26/2023

HUNTON ANDREWS KURTH

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DATE: 04/26/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH MARCH 31, 2023:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
03/01/2023	V CHAPUNOFF	Coordinate deposition of Defendant's 30(b)(6) corporate representative.	0.20
03/01/2023	V CHAPUNOFF	Analyze invoices received from Esquire for deposition of L. Kurtz and prepare correspondence to Esquire regarding same.	0.20
03/01/2023	C D STEKLOF	Exchange correspondence regarding deposition scheduling and request for production to U.S. Sugar's expert	0.20
03/02/2023	J L HUCKABA	Evaluate strategy for reviewing expert's deposition transcript to raise objections.	0.20
03/02/2023	C D STEKLOF	Exchange various correspondence regarding deposition scheduling and issues related to same	0.30
03/03/2023	V CHAPUNOFF	Analyze S. Hawkins amended notice of deposition, and information sent to and from opposing counsel regarding depositions, draft amended notice of Defendant's 30(b)(6) corporate representative, and supplement deposition calendar chart to reflect updates.	0.40
03/05/2023	J L HUCKABA	Analyze amended expert deposition notice and requests for production to raise objections to requests.	1.70
03/06/2023	W ANDREWS	Outline potential lines of inquiry for AIG 30(b)(6) deposition; prepare for Mr. Hawkins' expert deposition; outline potential motions in limine; review possible objections to expert deposition topics.	2.00
03/06/2023	V CHAPUNOFF	Revise draft amended notice of deposition of Defendant's 30(b)(6) corporate representative.	0.10

HUNTON ANDREWS KURTH LLP
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
03/06/2023	C D STEKLOF	Analyze potential motions in limine and next steps in connection with litigation (.5); address various issues related to deposition scheduling and content of 30(b)(6) deposition (.5); [REDACTED] [REDACTED] and potential issues regarding AIG's expert discovery document requests (1.7).	2.70
03/07/2023	W ANDREWS	Review potential motion in limine strategy.	0.70
03/07/2023	V CHAPUNOFF	Revise draft amended notice of deposition of Defendant's 30(b)(6) corporate representative.	0.10
03/07/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel regarding depositions, supplement defendant tracking chart to reflect updates, coordinate deposition of Defendant's 30(b)(6) representative, analyze L. Kurtz deposition exhibits and prepare for input into database, create deposition exhibits chart, and analyze next steps in connection with pending document collection matters.	2.00
03/07/2023	J L HUCKABA	Evaluate strategy for drafting trial outline on the breach of contract action, including elements, relevant case law, evidence we have, and substantive arguments.	0.30
03/07/2023	J L HUCKABA	Evaluate strategy for drafting motions in limine, including deciding narrow issues to be researched in connection with the motions.	0.70
03/07/2023	J L HUCKABA	Analyze deposition transcripts for questionable fees and invoices.	2.00
03/07/2023	J L HUCKABA	Analyze prior motions in limine to develop arguments for motions in limine to be filed in current matter.	0.90
03/07/2023	J L HUCKABA	Analyze opposing counsel's responses to written interrogatories and affirmative defenses asserted in pleadings to develop arguments for motions in limine.	0.70
03/07/2023	C D STEKLOF	Analyze issues related to motions in limine and exchange various correspondence regarding necessary research related to same (1.0); analyze outstanding issues related to calculation of damages and additional documents to be produced (.5); review written discovery, summary judgment briefing, and AIG production and outline key admissions to obtain during insurer's 30(b)(6) deposition (4.3).	5.80
03/08/2023	W ANDREWS	Review motion in limine rulings in SD Florida and consider appropriate motions for US Sugar.	1.50

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
03/08/2023	V CHAPUNOFF	Conference call with attorney and client to discuss pending document collection and information matters, analyze information and documents received from client on March 8, 2023, prepare said documents for production to Defendant, and supplement invoice tracking chart to reflect updates.	2.20
03/08/2023	V CHAPUNOFF	Analyze and prepare for database L. Kurtz deposition exhibits, supplement deposition exhibits chart, and coordinate deposition of Defendant's corporate representative.	1.00
03/08/2023	J L HUCKABA	Draft memorandum on whether an insurer can raise issues of policy interpretation, including conditions precedent, for the first time at trial.	0.80
03/08/2023	J L HUCKABA	Analyze precedent on whether an insurer can argue questions of policy interpretation before the jury where the insurer did not raise the issues to the court prior to trial.	2.30
03/08/2023	J L HUCKABA	Research precedent on whether a party can raise issues of policy interpretation at trial if the party never raised the issue to the court before trial.	2.10
03/08/2023	J L HUCKABA	Evaluate strategy for issues to be included in motions in limine, including issues that are not appropriate for a jury.	0.60
03/08/2023	C D STEKLOF	Prepare for AIG 30(b)(6) deposition (6.9); review research and analysis relating to forthcoming motions in limine (.5).	7.40
03/09/2023	W ANDREWS	Review additional research on possible motions in limine.	0.50
03/09/2023	V CHAPUNOFF	Analyze information received from TSG in relation to upcoming deposition of Defendant's corporate representative.	0.10
03/09/2023	V CHAPUNOFF	Supplement invoice tracking chart to reflect bates production numbers of proof of payments and invoices, and confirm payment amounts match invoice amounts.	1.60
03/09/2023	J L HUCKABA	Evaluate strategy for researching the legal standard for motions in limine in the context of insurance policies.	0.40
03/09/2023	C D STEKLOF	Prepare for AIG 30(b)(6) deposition (5.8); address outstanding issues with invoices (.3); communicate regarding research related to motions in limine (.5).	6.60
03/10/2023	W ANDREWS	Review additional possible motions in limine arguments.	0.50

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03/10/2023	V CHAPUNOFF	Analyze information received from TSG in relation to upcoming deposition of Defendant's corporate representative, and follow up with L. Kurtz on his errata sheet.	0.20
03/10/2023	V CHAPUNOFF	Identify and prepare documents for use in Defendant's 30(b)(6) deposition.	1.10
03/10/2023	V CHAPUNOFF	Supplement invoice tracking chart to reflect bates production numbers of invoices.	3.90
03/10/2023	J L HUCKABA	Analyze previously filed motions and orders entered in the Southern District of Florida in connection with drafting motions in limine.	0.60
03/10/2023	J L HUCKABA	Research precedent on the legal standard for motions in limine.	1.00
03/10/2023	C D STEKLOF	Prepare for and outline AIG 30(b)(6) deposition and complete review of exhibits	4.70
03/12/2023	J L HUCKABA	Analyze precedent on the legal standards for motions in limine, including whether a motion to exclude evidence of affirmative defenses is appropriate.	1.80
03/13/2023	W ANDREWS	Obtain report on AIG deposition and consider appropriate follow-up; review possible additional Motion in Limine strategy.	1.00
03/13/2023	V CHAPUNOFF	Prepare for M. Churchill deposition, and correspond with TSG regarding rush transcript and exhibit order for said deposition.	0.60
03/13/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel on March 10, 2023 regarding depositions, and supplement deposition calendar chart to reflect updates.	0.20
03/13/2023	V CHAPUNOFF	Supplement invoice tracking chart to reflect bates production numbers of proof of payments and invoices, confirm payment amounts match invoice amounts, analyze CoOp payment information and correspond with client regarding pending CoOp payment matters.	3.20
03/13/2023	J L HUCKABA	Evaluate strategy for drafting notice of supplemental authority in connection with summary judgment briefings.	0.30
03/13/2023	J L HUCKABA	Analyze local rules for filing a notice of supplemental authority.	0.40
03/13/2023	J L HUCKABA	Draft summary of legal standards and appropriateness of motions in limine on evidence relating to affirmative defenses.	0.20
03/13/2023	J L HUCKABA	Evaluate strategy for filing notice of supplemental authority and drafting motions in limine,	0.70

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
03/13/2023	C D STEKLOF	Conduct 30(b)(6) deposition of AIG corporate representative and exchange follow-up correspondence regarding transcript (7.0); communicate with client regarding same and next steps (1.0); analyze various issues related to trial strategy going forward (1.0); analyze research surrounding notice of supplemental authority and motions in limine and consider content of same (1.5); review relevant portions of deposition transcript for notice of supplemental authority to court and draft same (1.0).	11.50
03/14/2023	W ANDREWS	Telephone call with Mr. Schwinghammer regarding Dentons appearance in case and possible conflict; review deposition transcript for AIG 30(b)(6) witness and outline supplemental submission in opposition to AIG motion for partial summary judgment.	2.00
03/14/2023	V CHAPUNOFF	Download and prepare for database M. Churchill deposition transcript, exhibits and video files, supplement deponent tracking chart, supplement deposition exhibits index, and analyze TSG invoices for M. Churchill deposition.	1.30
03/14/2023	V CHAPUNOFF	Analyze next steps in connection with pending CoOp payment matters.	0.20
03/14/2023	V CHAPUNOFF	Serve supplemental document production via FTP site and supplement invoice tracking chart to reflect same.	0.20
03/14/2023	K L FAGLIONI	Conference with and correspondence to Cary Steklof regarding conflicts analysis related to Dentons pro hac vice appearance in the coverage litigation in light of two former Gunster lawyers who transferred to Dentons	0.80
03/14/2023	J L HUCKABA	Analyze prior notices of supplemental authority filed in the Southern District of Florida to determine the application of the local rules.	0.30
03/14/2023	J L HUCKABA	Draft correspondence in connection with pulling notices of supplemental authority filed in the Southern District of Florida.	0.10
03/14/2023	C D STEKLOF	Analyze key portions of AIG 30(b)(6) deposition transcript to support Notice of Supplemental Authority and draft same with supporting evidence from summary judgment briefing (4.3); analyze potential ethical issues related to AIG's retention of Dentons and draft proposed correspondence to opposing counsel regarding same (2.0); address various issues related to production of documents and reconciliation of damages incurred (.5).	6.80
03/15/2023	W ANDREWS	Review conflict issues and strategy regarding Dentons; review draft motion in limine.	1.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
03/15/2023	K L FAGLIONI	Review of draft correspondence regarding potential conflict issue related to Dentons pro hac vice appearance in the coverage litigation in light of two former Gunster lawyers who transferred to Dentons; correspondence with Cary Steklof regarding same.	0.80
03/15/2023	J L HUCKABA	Draft motion in limine requesting that the court preclude arguments and references to the truth of the allegations in the underlying litigation.	1.00
03/15/2023	J L HUCKABA	Evaluate strategy for conferral on motions in limine, including narrowing list of specific issues to be included in the motions in limine.	0.10
03/15/2023	C D STEKLOF	Review complete 30(b)(6) deposition transcript and annotate key portions for use in connection with Motions in Limine (2.0); outline various Motions in Limine to narrow scope of trial (1.0); review authority related to Motions in Limine and examples of same to address outstanding pretrial issues (2.0); analyze various issues related to Dentons' conflict of interest with AIG representation and next steps with same (1.1).	6.10
03/16/2023	W ANDREWS	Work on letters to AIG regarding conflict; conference call with Mr. Schwinghammer regarding same; review additional research regarding same; review AIG threat to move to strike filing of supplemental authority as to AIG deposition testimony and consider response to same; review strategy regarding motions in limine.	4.00
03/16/2023	K L FAGLIONI	Conference with Cary Steklof regarding potential conflict issue related to Dentons pro hac vice appearance in the coverage litigation in light of two former Gunster lawyers who transferred to Dentons; correspondence with Cary Steklof regarding same and discussion of "playbook" knowledge as pertinent to conflicts analysis.	0.80
03/16/2023	J L HUCKABA	Analyze and review correspondence regarding potential conflicts with newly added firm.	0.10
03/16/2023	J L HUCKABA	Review and analyze correspondence regarding potential conflict of interest.	0.40
03/16/2023	C D STEKLOF	Draft various Motions in Limine in order to narrow scope of trial (5.5); analyze various issues related to same and trial strategy (1.5); confer with opposing counsel regarding threat to strike notice of AIG's 30(b)(6) testimony and exchange correspondence regarding same (1.0).	8.00

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
03/17/2023	W ANDREWS	Review new coverage letter from AIG regarding payment of defense costs and consider strategy regarding same; review draft motions in limine; review latest developments regarding Denton's conflict.	2.00
03/17/2023	V CHAPUNOFF	Submit L. Kurtz errata sheet to opposing counsel and supplement deponent tracking chart to reflect updates.	0.20
03/17/2023	J L HUCKABA	Review insurer's supplemental coverage letter for payment of the undisputed amounts of defense costs.	0.20
03/17/2023	C D STEKLOF	Draft and revise various motions in limine	8.30
03/18/2023	C D STEKLOF	Exchange correspondence regarding revisions to motions in limine	0.20
03/19/2023	C D STEKLOF	Draft and revise motions in limine	3.30
03/20/2023	W ANDREWS	Work on motions in limine; address Dentons conflict issue; [REDACTED]	3.50
03/20/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel on March 17, 2023 through March 20, 2023, regarding motions in limine conferral and depositions, and supplement deposition calendar chart to reflect updates.	0.40
03/20/2023	K L FAGLIONI	Correspondence with Cary Steklof regarding conflicts analysis related to Dentons pro hac vice appearance in the coverage litigation in light of two former Gunster lawyers who transferred to Dentons	0.50
03/20/2023	J L HUCKABA	Analyze and review draft motions in limine to determine revisions.	0.80
03/20/2023	J L HUCKABA	Analyze draft letter to insurer to determine revisions in connection with resolving potential conflict of interest.	0.30
03/20/2023	J L HUCKABA	[REDACTED]	1.20
03/20/2023	J L HUCKABA	Evaluate strategy for meet and confer in connection with motions in limine.	0.40
03/20/2023	J L HUCKABA	Meet and confer with opposing counsel in connection with motions in limine.	1.00
03/20/2023	J L HUCKABA	Draft summary of meet and confer to determine strategy in connection with motions in limine.	0.70

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03/20/2023	C D STEKLOF	Communicate regarding ongoing conflict issue with Dentons (.5); exchange correspondence with opposing counsel regarding same and conduct conferral regarding motions in limine (1.0); draft and revise motions in limine (6.1).	7.60
03/21/2023	W ANDREWS	Review new correspondence from AIG regarding coverage payment and settlement negotiations; [REDACTED] [REDACTED]; review and supplement various draft motions in limine; review AIG motions in limine.	3.00
03/21/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel regarding both parties' motions in limine, annotate M. Churchill deposition transcript for use as exhibit to U.S. Sugar's motions in limine ("motion"), prepare exhibits to motion, and e-file.	1.30
03/21/2023	J L HUCKABA	Review correspondence from insurer's counsel in connection with its official response to the potential conflict of interest.	0.10
03/21/2023	J L HUCKABA	Analyze precedent on notices of supplemental authority based on deposition in connection with insurer's response to first notice of supplemental authority.	0.50
03/21/2023	J L HUCKABA	Review correspondence from opposing counsel on proposed motions in limine, including agreement to exclude the insurer's litigation from trial.	0.10
03/21/2023	J L HUCKABA	Analyze precedent on motions in limine seeking preclusion of references to an insurer's claim handling and bad faith at trial.	0.80
03/21/2023	J L HUCKABA	Draft email to library in connection with research for motions in limine and second notice of supplemental authority.	0.20
03/21/2023	J L HUCKABA	Analyze and review correspondence from opposing counsel regarding insurer's recent letter and agreement to issue payment.	0.50
03/21/2023	J L HUCKABA	Evaluate strategy for researching a party's ability to file a communication from the opposing party under a notice of supplemental authority.	0.30
03/21/2023	J L HUCKABA	Evaluate strategy for asking the court to allow references to its duty to defend ruling in connection with motions in limine.	0.30

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03/21/2023	C D STEKLOF	Analyze necessary supplement to motions in limine (.5); draft, revise, and finalize motions in limine and coordinate filing of same (9.0); draft and revise response to AIG motion seeking leave to file extended response to Notice of Supplemental Authority (1.3).	10.80
03/22/2023	W ANDREWS	Review conflicts response from Dentons and consider next steps; review AIG request to file response to notice of supplemental authority and review and supplement opposition to same; telephone call with Mr. Kurtz regarding case strategy; review discovery issues; review AIG motions in limine and consider reply arguments; review correspondence regarding Dentons conflict.	4.30
03/22/2023	V CHAPUNOFF	Analyze Esquire invoices for L. Kurtz deposition and correspond with Esquire regarding same.	0.20
03/22/2023	K L FAGLIONI	Correspondence with Cary Steklof regarding Dentons GC's correspondence on Dentons conflicts issue; correspondence with Dentons GC regarding same	0.50
03/22/2023	J L HUCKABA	Evaluate strategy for reviewing insurer's motions in limine and determining agreements and oppositions to the request.	0.60
03/22/2023	C D STEKLOF	Revise and finalize response to AIG's motion for leave to file five-page brief on deposition transcript (.5); analyze various issues related to motions in limine and next steps in connection with litigation (.5)	2.40
		(1.4).	
03/23/2023	W ANDREWS	Review court order on AIG request for leave to file opposition to notice of supplemental authority and consider implications of same and legal research regarding issues raised; review AIG motions in limine and outline strategy in opposing same; review strategy regarding Dentons conflicts and next steps regarding same.	2.50
03/23/2023	K L FAGLIONI	Conference with Dentons GC	0.50
03/23/2023	J L HUCKABA	Review court's order on insurer's motion for leave to file response to the first notice of supplemental authority.	0.10
03/23/2023	J L HUCKABA	Research precedent on submitting letters and communications to the court by filing a notice of supplemental authority.	0.80
03/23/2023	J L HUCKABA	Draft summary of arguments in opposition to insurer's motions in limine requesting that the court exclude evidence of bad faith and claims handling.	0.60

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
03/23/2023	J L HUCKABA	Analyze insurer's motion for leave to file a response to the notice of supplemental authority to address arguments in opposition.	0.60
03/23/2023	J L HUCKABA	Discuss strategy for opposition to insurer's omnibus motion in limine and filing a second notice of supplemental authority.	0.70
03/23/2023	J L HUCKABA	Analyze scheduling order, local rules for the southern district of Florida, and the federal rules of civil procedure to determine pretrial deadlines.	1.20
03/23/2023	J L HUCKABA	Research precedent nationwide on whether an admission against interest is an authority in support of or in opposition to a summary judgment motion.	1.00
03/23/2023	C D STEKLOF	Analyze next steps in connection with litigation, appropriate response to AIG's updated coverage letters, and Dentons conflict issue	2.20
03/24/2023	W ANDREWS	Review trial strategy; review strategy regarding Dentons conflict; outline arguments for notice of supplemental authority regarding AIG admission against interest in March 17 letter and review legal authority regarding same; review AIG response to first notice of supplemental authority and consider implications; follow up discussions regarding Mr. Kurtz's comments on Dentons conflict.	3.20
03/24/2023	K L FAGLIONI	Conference with Cary Steklaf regarding Dentons conflict issue.	0.50
03/24/2023	J L HUCKABA	Research opinions by district court judge citing an admission against interest as the reason to deny summary judgment.	1.50
03/24/2023	J L HUCKABA	Evaluate strategy for covering pretrial deadlines, such as filing voir dire questions, disclosing trial witnesses, and filing proposed jury instructions.	0.30
03/24/2023	J L HUCKABA	Analyze local and federal rules to determine procedure for filing a motion for leave to amend the complaint.	0.30
03/24/2023	J L HUCKABA	Analyze precedent nationwide on whether an admission against interest is an authority.	1.60
03/24/2023	J L HUCKABA	Draft email to insurance coverage team in connection with determining whether an amendment to the complaint is required to include prior policy.	0.40
03/24/2023	A A PEREZ	Analyze issues pending before court in order to assist with trial.	0.60

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03/24/2023	C D STEKLOF	Communicate with client and Mr. Schwinghammer regarding conflict issue with Dentons (1.0); communicate with Ms. Faglioni regarding same and compile summary and relevant materials for research and analysis under governing ethics and conflicts rules (1.2); address various issues related to next steps in connection with litigation and trial preparation (1.5).	3.70
03/25/2023	K L FAGLIONI	Conference and correspondence with Halyna Hnatkiv regarding researching needed on Dentons conflict issue.	1.00
03/25/2023	H HNATKIV	Evaluate strategy for disqualification research on conflicts issue	0.70
03/26/2023	H HNATKIV	Research disqualification case law and rules in FL regarding conflicts issue	5.20
03/26/2023	C D STEKLOF	Analyze upcoming litigation tasks and potential amendments to initial disclosures	0.30
03/27/2023	W ANDREWS	Conference call with client and Mr. Schwinghammer regarding Dentons conflict and next steps regarding same; review legal and factual research regarding same; conference call with Office of General Counsel regarding ethics and disqualification strategy; review strategy regarding trial exhibits; review briefing strategy regarding motions in limine and notice of supplemental authority in opposition to AIG summary judgment motion.	3.00
03/27/2023	V CHAPUNOFF	Analyze docket entries 61-74 related to Defendant's reply statement of material facts, Defendant's reply in support of motion for partial summary judgment, Defendant's motions for pro hac vice admission, Plaintiff's notice of supplemental authority, and both parties' motions in limine, and supplement court pleadings index to reflect same.	0.70
03/27/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel and supplement deposition calendar chart to reflect updates.	0.30
03/27/2023	V CHAPUNOFF	Analyze AIG letter to U.S. Sugar dated March 17, 2023 regarding reimbursement of underlying case invoices and Hunton legal fees, analyze information sent to and from client regarding identifying and collecting proof of payments for Hunton invoices, correspond with internal Accounting Department regarding said Hunton invoices, analyze next steps in connection with pending underlying case invoice matters, including call with attorneys, and analyze underlying case invoices to identify any unrelated matters that need to be excluded.	4.50

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
03/27/2023	V CHAPUNOFF	Analyze deadlines and create deadlines tracking chart.	1.30
03/27/2023	K L FAGLIONI	Review research memo; Conference with Cary Steklof and Walter Andrews; conference with Cary Steklof, Walter Andrews, Luke Kurtz, and Greg Schwinghammer regarding Dentons conflict issue	1.50
03/27/2023	J L HUCKABA	Analyze local rules and scheduling order to determine disclosure requirements for trial witnesses.	0.20
03/27/2023	J L HUCKABA	[REDACTED]	1.10
03/27/2023	J L HUCKABA	[REDACTED]	0.70
03/27/2023	J L HUCKABA	Evaluate strategy for trial preparation, including preparing exhibits and supplementing initial disclosures.	1.00
03/27/2023	J L HUCKABA	[REDACTED]	0.20
03/27/2023	J L HUCKABA	Analyze local and federal rules for requirements of the joint pretrial stipulation.	0.80
03/27/2023	J L HUCKABA	Draft summary of local rule 16.1(e) and 16.1(d)(2) in connection with strategy for complying with required pretrial disclosures.	0.50
03/27/2023	A A PEREZ	Analyze AIG's summary judgment motion and US Sugar's opposition to the same in order to get up to speed on the case in preparation for trial.	1.20
03/27/2023	A A PEREZ	Analyze US Sugar's motion for judgment on the pleadings and the Court's order regarding the same in preparation for trial.	0.90
03/27/2023	A A PEREZ	Analyze complaint in order to get up to speed with matter ahead of trial.	0.50
03/27/2023	A A PEREZ	Participate in teleconference regarding how to proceed with invoices in anticipation of trial.	0.60
03/27/2023	A A PEREZ	Analyze issues pending before court in order to get up to speed on case.	0.90
03/27/2023	C D STEKLOF	Address various issues related to Dentons conflict, potential disqualification motion, and communicate with client regarding same (2.0); draft and revise proposed correspondence to AIG general counsel regarding conflict issue (1.0); analyze various materials in connection with response to AIG's motions in limine and address various issues related to discovery and amendment on complaint (2.4).	5.40

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03/28/2023	W ANDREWS	Review potential trial witnesses to identify; review draft correspondence to AIG regarding Dentons conflict; review legal issues regarding same.	1.50
03/28/2023	V CHAPUNOFF	Analyze underlying case invoices to identify any unrelated matters that need to be excluded, and supplement invoice tracking chart to reflect invoice matter topics.	3.50
03/28/2023	V CHAPUNOFF	Identify key factual materials to assist counsel with legal analysis and case strategy.	0.20
03/28/2023	V CHAPUNOFF	Analyze deadlines and create deadlines tracking chart.	0.40
03/28/2023	V CHAPUNOFF	Analyze next steps in connection with identifying and collecting proof of payments for Hunton invoices.	0.20
03/28/2023	J L HUCKABA	Draft next steps for amending rule 26(a) required disclosures to include any additional individuals with relevant knowledge that may be called at trial.	0.20
03/28/2023	J L HUCKABA	Research precedent nationwide on whether an authority for the purpose of notices of supplement authority includes letters, emails, or communications.	3.30
03/28/2023	J L HUCKABA	Draft summary of case law on admissions against interest serving as a basis for denial of summary judgment.	0.60
03/28/2023	J L HUCKABA	Draft summary of Florida precedent on reasonable fees in connection with trial outline.	0.20
03/28/2023	A A PEREZ	Analyze motions in limine filed in this matter in preparation for trial.	1.30
03/28/2023	A A PEREZ	Analyze pending issues in this matter in order to get up to speed to assist with trial.	1.00
03/28/2023	A A PEREZ	Analyze deadlines in case to develop strategy for trial preparation.	0.30
03/28/2023	A A PEREZ	Analyze recent coverage letters sent by AIG regarding payment of claim.	0.40
03/28/2023	A A PEREZ	Analyze expert reports in order to get up to speed and prepare for trial.	1.10
03/28/2023	C D STEKLOF	Analyze AIG's motions in limine and outline appropriate responses to same (1.5); communicate with Ms. Perez regarding various issues related to litigation and tasks to complete (1.2); draft and revise proposed follow-up correspondence on Dentons conflict issue (.7); draft opposition to AIG's motions in limine (5.4).	8.80

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03/29/2023	W ANDREWS	outline arguments in opposition to motions in limine; review developments regarding Dentons conflict and outline next steps; outline supplemental submission in opposition to summary judgment motion.	3.50
03/29/2023	J L HUCKABA	Review correspondence on strategy for opposing and stipulating to insurer's motions in limine.	0.20
03/29/2023	J L HUCKABA	Research precedent on whether the policyholder must amend its complaint to identify the correct policy in a coverage action against its insurer where the insurer issued all relevant policies.	1.90
03/29/2023	J L HUCKABA	Analyze invoices for fees paid in the underlying litigation in connection with finalizing trial exhibits.	2.70
03/29/2023	A A PEREZ	Analyze Ms. Churchill's deposition transcript in order to begin deposition designations.	3.60
03/29/2023	A A PEREZ	Begin drafting trial outline.	1.40
03/29/2023	A A PEREZ	Research cases in Florida regarding motions in limine in attorneys fees disputes to find support for US Sugar's opposition to AIG's fourth motion in limine.	0.90
03/29/2023	C D STEKLOF	Address various issues related to conflicts, discovery, and potential amendment of complaint (1.7); communicate with Mr. Andrews regarding notice of supplemental authority and draft/revise content of same (1.0).	2.70
03/30/2023	W ANDREWS	Review draft notice of supplemental authority; review legal research regarding AIG motions in limine; review additional reports from Gunster on Dentons conflict; review strategy regarding same.	1.70
03/30/2023	V CHAPUNOFF	Analyze information and proof of payments for Hunton and expert invoices received from client on March 29, 2023 and March 30, 2023, and create invoice tracking chart.	1.00
03/30/2023	V CHAPUNOFF	Analyze underlying case invoices to identify invoices that need to be excluded for work performed post February 2022, and for unrelated matters, supplement invoice tracking chart to reflect said analysis, and analyze next steps in connection with same.	1.30
03/30/2023	J L HUCKABA	Evaluate strategy for researching precedent on evidence speaking directly to witness's credibility in connection with opposition to insurer's motions in limine.	0.10
03/30/2023	J L HUCKABA	Review second notice of supplemental authority for filing.	0.20

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
03/30/2023	J L HUCKABA	Evaluate strategy for analyzing policy language on related claims in connection with amending complaint.	0.40
03/30/2023	J L HUCKABA	Analyze precedent cited in insurer's motions in limine on conscience of the community arguments.	0.80
03/30/2023	J L HUCKABA	Research precedent on whether excluding "send a message" arguments and comments is permissible on a motion in limine.	1.50
03/30/2023	J L HUCKABA	Draft summary of potential issues that could arise with amending the complaint to include prior policy.	0.20
03/30/2023	A A PEREZ	Research cases holding that evidence that can attack and expert's credibility is admissible.	1.00
03/30/2023	A A PEREZ	Research cases holding that evidence that can attack an insurer's credibility is relevant and admissible.	3.00
03/30/2023	A A PEREZ	Analyze cases discussing whether a motion in limine to preclude counsel from instructing the jury to "send a message" is appropriate.	0.80
03/30/2023	C D STEKLOF	Address various issues related to litigation tasks and necessary research	0.60
03/31/2023	W ANDREWS	Telephone call with Mr. Kurtz re trial strategy;	3.00
03/31/2023	J L HUCKABA	[REDACTED]	0.30
03/31/2023	J L HUCKABA	[REDACTED]	0.30
TOTAL HOURS			281.60

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	44.40	1,247.00	55,366.80
K L FAGLIONI	Partner	6.90	1,080.00	7,452.00
C D STEKLOF	Counsel	116.40	869.00	101,151.60
H HNATKIV	Associate	5.90	536.00	3,162.40
J L HUCKABA	Associate	54.20	536.00	29,051.20
A A PEREZ	Associate	19.50	779.00	15,190.50
V CHAPUNOFF	Paralegal	34.30	333.00	11,421.90
TOTAL FEES (\$)				222,796.40

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FOR COSTS ADVANCED AND EXPENSES INCURRED:

CODE	DESCRIPTION	AMOUNT
E106	Online Research	172.08
E116	Trial Transcripts	4,437.25
TOTAL CURRENT EXPENSES (\$)		4,609.33

INVOICE SUMMARY:

Current Fees:	\$ 222,796.40
Current Charges:	4,609.33
CURRENT INVOICE AMOUNT DUE:	\$ 227,405.73



HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032863
DATE: 05/18/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending April 30, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 402,604.90
Current Charges:	4,895.04
CURRENT INVOICE AMOUNT DUE:	\$ 407,499.94

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114032602	0000016	03/31/2023	132,828.00
114032725	0000016	04/26/2023	227,405.73

Outstanding Balance (for matter(s) on this invoice): 360,233.73

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 767,733.67

TO RECEIVE PROPER CREDIT, PLEASE ATTACH REMITTANCE COPY WITH PAYMENT.

FOR BILLING INQUIRIES, PLEASE CALL: 804-788-8555

To Pay By Mail:
HUNTON ANDREWS KURTH LLP
PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: 001458094
ABA Transit: 061000104
Swift Code (International): SNTRUS3A
Information with Wire: File: 054740.0000016, Inv: 114032863, Date: 05/18/2023



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MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE DETAIL

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114032863
DATE: 05/18/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH APRIL 30, 2023:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/01/2023	C D STEKLOF	Draft and revise opposition to AIG's motions in limine	4.10
04/02/2023	W ANDREWS	Review and comment on draft responses opposing AIG's motions in limine.	1.20
04/02/2023	C D STEKLOF	Draft and revise opposition to AIG's motions in limine	1.70
04/03/2023	W ANDREWS	Telephone call with Mr. Kurtz regarding settlement overture by AIG and follow up regarding same with mediator; [REDACTED] work on brief in opposition to motions in limine; work on stipulations regarding agreed upon motions; work on trial witness and trial exhibit selection; [REDACTED]; review new order on partial summary judgment motion and consider implications and next steps.	5.50
04/03/2023	V CHAPUNOFF	Analyze order on Defendant's motion for summary judgment and perform calculations of pre- and post-underlying litigation costs to determine overall damage figure.	1.70
04/03/2023	V CHAPUNOFF	Analyze next steps in connection with preparing for trial and create trial supplies list.	1.50
04/03/2023	J L HUCKABA	Evaluate strategy for outlining witness testimony in connection with preparing trial outline.	0.20
04/03/2023	J L HUCKABA	Evaluate strategy for preparing exhibits and drafting trial outline in connection with trial preparation.	0.80
04/03/2023	J L HUCKABA	Review correspondence on next steps for trial preparation and amending complaint.	0.10
04/03/2023	J L HUCKABA	Analyze and review court's order on insurer's motion for summary judgment.	0.30

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/03/2023	J L HUCKABA	[REDACTED]	0.20
04/03/2023	J L HUCKABA	[REDACTED]	0.40
04/03/2023	J L HUCKABA	[REDACTED]	2.00
04/03/2023	A A PEREZ	Analyze Court's order on AIG's motion for summary judgment.	0.30
04/03/2023	A A PEREZ	Analyze Luke Kurtz deposition transcript in preparation for trial.	1.50
04/03/2023	A A PEREZ	Draft trial outline which identifies issues to be presented at trial and evidence supporting US Sugar's arguments.	5.10
04/03/2023	A A PEREZ	Develop strategy for trial.	2.00
04/03/2023	A A PEREZ	Analyze upcoming deadline and tasks that need to be completed to meet deadlines in preparation for trial.	1.10
04/03/2023	C D STEKLOF	Communicate with team regarding upcoming litigation tasks (.5); analyze various issues related to trial logistics (.5); [REDACTED]; exchange various correspondence related to motions in limine and proposed stipulations to opposing counsel (1.0); analyze court's order on summary judgment motion and exchange various correspondence with client regarding same (1.5); communicate regarding potential mediation and draft detailed correspondence to mediator regarding same (.7); [REDACTED].	9.70
04/04/2023	W ANDREWS	[REDACTED]; [REDACTED]; [REDACTED]; work on oppositions to AIG motions in limine; work on trial outline; review legal research in support of coverage and defense costs arguments; [REDACTED] [REDACTED].	5.50
04/04/2023	V CHAPUNOFF	Analyze underlying case invoices to confirm work performed fall between June 4, 2019 and February 25, 2022, and identify and isolate said invoices in production format for use at trial.	4.80

HUNTON ANDREWS KURTH LLP
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/04/2023	V CHAPUNOFF	Analyze next steps in connection with preparing underlying case invoices and proof of payments for trial, perform various rough calculations as to said invoices, prepare FTP link containing questionable underlying case invoices for client, and prepare Hunton and expert invoices for delivery to opposing counsel for reimbursement.	1.20
04/04/2023	V CHAPUNOFF	Analyze information sent to and from opposing counsel regarding proposed stipulations for C&I's motions in limine.	0.10
04/04/2023	J L HUCKABA	[REDACTED]	0.40
04/04/2023	J L HUCKABA	[REDACTED]	0.80
04/04/2023	J L HUCKABA	[REDACTED]	0.30
04/04/2023	J L HUCKABA	[REDACTED]	0.60
04/04/2023	J L HUCKABA	Evaluate strategy for researching presumption of reasonableness of fees where an insurer abandons its policyholder.	0.30
04/04/2023	J L HUCKABA	Analyze recent southern district of New York decision on the reasonableness of fees in connection with preparing for trial.	0.20
04/04/2023	J L HUCKABA	Research precedent on the general standards for leave to amend pleadings and the court's discretion.	0.70
04/04/2023	J L HUCKABA	Analyze local rules to determine requirements for oppositions to motions in limine, including length requirements.	0.20
04/04/2023	J L HUCKABA	[REDACTED]	0.70
04/04/2023	J L HUCKABA	[REDACTED]	0.70
04/04/2023	J L HUCKABA	[REDACTED]	0.70
04/04/2023	J L HUCKABA	[REDACTED]	0.30
04/04/2023	J L HUCKABA	[REDACTED]	0.60

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/04/2023	J L HUCKABA	[REDACTED]	0.40
04/04/2023	J L HUCKABA	[REDACTED]	0.30
04/04/2023	A A PEREZ	Begin drafting stipulated facts.	0.60
04/04/2023	A A PEREZ	Draft U.S. Sugar's proposed Voir Dire questions.	1.20
04/04/2023	A A PEREZ	Analyze cases discussing reasonable market rates in the Southern District of Florida.	0.20
04/04/2023	A A PEREZ	Analyze what evidence is needed to show that the underlying lawsuit was a "bet the company" case.	1.10
04/04/2023	A A PEREZ	Mark up Ms. Churchill's deposition transcript for deposition designation.	2.20
04/04/2023	A A PEREZ	Analyze decision in Tutor Perini Building Corp. v. First Mercury Ins Co. regarding pre-tender defense costs.	1.00
04/04/2023	K M RUDD	Research lawsuit which caused Hawaiian Commercial & Sugar Company to go out of business and any related articles that discuss how that case threatened other companies in the sugar industry.	0.40
04/04/2023	C D STEKLOF	[REDACTED] (3.5); communicate with client regarding monetary outlook for coverage litigation (.4); exchange correspondence with opposing counsel regarding stipulations in connection with motions in limine (.5); communicate regarding issues related to analysis of invoices and remaining fees in dispute (.5); communicate regarding various issues related to order from court regarding fees associated with defense and next steps in connection with same (1.2); revise and finalize opposition to AIG's motions in limine (3.0); address various issues related to pretrial tasks (.9).	10.00
04/05/2023	W ANDREWS	Review AIG briefs in opposition to motions in limine and consider possible arguments for reply briefs; [REDACTED]; review research regarding defense fee trial standards and proof requirements; consider strategy regarding experts.	2.40
04/05/2023	V CHAPUNOFF	Identify and isolate underlying case invoices and proof of payments in production format, analyze CoOp payment information, and create CoOp payment spreadsheet to reflect CoOp payments for relevant time period only.	4.10
04/05/2023	V CHAPUNOFF	Analyze and update task list.	0.30

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/05/2023	J L HUCKABA	[REDACTED]	0.90
04/05/2023	J L HUCKABA	[REDACTED]	1.00
04/05/2023	J L HUCKABA	[REDACTED]	0.50
04/05/2023	J L HUCKABA	[REDACTED]	0.10
04/05/2023	A A PEREZ	Analyze AIG's opposition to US Sugar's motions in limine and develop strategy for reply.	1.60
04/05/2023	A A PEREZ	Research and analyze cases discussing whether there is a presumption of reasonableness regarding the fees an insured incurred when an insurer wrongfully takes the position it does not have a duty to defend.	1.40
04/05/2023	A A PEREZ	Analyze cases in Florida discussing whether a determination of fees can be decided via summary judgment.	4.60
04/05/2023	C D STEKLOF	Review research regarding reasonableness of attorneys fees as issue of fact for jury and communicate regarding same (1.0); analyze AIG's opposition to motions in limine and outline issues to address in reply to same (1.5); address various issues related to litigation tasks, upcoming deadlines, and litigation strategy (1.7).	4.20
04/06/2023	W ANDREWS	Conference call with Mr. Kurtz regarding trial strategy; [REDACTED]; review potential trial exhibits and trial witness identification; review and comment on draft demand for attorney fees; review strategy regarding Mr. Hawkins' deposition; review research regarding possible withdrawal of jury demand.	4.50
04/06/2023	V CHAPUNOFF	Analyze next steps in relation to preparing invoices for trial and case strategy, including conference call with attorneys.	0.90
04/06/2023	V CHAPUNOFF	Prepare index to documents produced by U.S. Sugar.	3.70
04/06/2023	V CHAPUNOFF	Analyze and update task list.	0.10
04/06/2023	J L HUCKABA	[REDACTED]	0.20
04/06/2023	J L HUCKABA	Evaluate strategy for researching precedent on unfair prejudice and confusion of issues in connection with reply to motions in limine.	0.10

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/06/2023	J L HUCKABA	Analyze excerpt memorandum on reasonableness of fees, including reviewing precedent from the Seventh Circuit Court of Appeals.	0.60
04/06/2023	J L HUCKABA	Evaluate strategy for reviewing invoices dated post-underlying lawsuit to determine work performed during suit period.	0.10
04/06/2023	J L HUCKABA	Research precedent on withdrawal of a jury demand, including reviewing local and federal rules.	0.40
04/06/2023	J L HUCKABA	Evaluate strategy on next steps in trial preparation, including withdrawing jury demand and reviewing invoices in light of summary judgment order.	0.90
04/06/2023	J L HUCKABA	[REDACTED]	0.20
04/06/2023	J L HUCKABA	Evaluate strategy for supplementing Rule 26 initial disclosures, including adding additional witnesses and providing a damage figure.	0.20
04/06/2023	A A PEREZ	Develop strategy for how to proceed on claim for US Sugar's fees in light of research on presumption of reasonableness of fees.	0.80
04/06/2023	A A PEREZ	Develop strategy for reply in support of US Sugar's motions in limine.	1.60
04/06/2023	A A PEREZ	Draft US Sugar's reply in support of Motion in Limine 1.	2.20
04/06/2023	A A PEREZ	Draft US Sugar's reply in support of Motion in Limine 2.	1.80
04/06/2023	A A PEREZ	Draft US Sugar's reply in support of Motion in limine 3.	1.20
04/06/2023	A A PEREZ	Draft US Sugar's reply in support of Motion in limine 4.	0.60
04/06/2023	A A PEREZ	Draft outline of introduction to reply in support of US Sugar's motions in limine.	0.50
04/06/2023	K M RUDD	Research voir dire questions that have been filed (and ideally approved) in front of Judge Scola	0.50
04/06/2023	C D STEKLOF	Communicate with client regarding potential trial witnesses on fees, analyze issues related to same, and draft correspondence regarding necessary amendments to Rule 26 disclosures (1.5); analyze AIG opposition to motions in limine and communicate regarding reply in support of U.S. Sugar's motions (1.0); communicate with team regarding various issues relating to litigation tasks (1.0); [REDACTED] [REDACTED] 3.3).	6.80

HUNTON ANDREWS KURTH LLP
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/07/2023	W ANDREWS	Review proposed deposition designations for AIG 30(b)(6) witness; [REDACTED] obtain report on call with Rodney Max regarding AIG position on mediation and consider response; review and supplement draft correspondence to AIG re fees owed.	2.00
04/07/2023	V CHAPUNOFF	Analyze and update task list.	0.20
04/07/2023	V CHAPUNOFF	Analyze time entries in underlying case invoices and supplement invoice tracking chart to reflect period of time worked.	5.20
04/07/2023	J L HUCKABA	Research precedent on rehashing arguments at trial and failure to comply with conditions precedent in connection with reply memorandum to motions in limine.	1.80
04/07/2023	J L HUCKABA	Research precedent nationwide on the presumption of reasonable fees where an insurer abandons its policyholder.	1.90
04/07/2023	A A PEREZ	Draft US Sugar's reply in support of Motion in limine 5.	0.80
04/07/2023	A A PEREZ	Draft US Sugar's reply in support of Motion in limine 6.	1.90
04/07/2023	A A PEREZ	Draft US Sugar's reply in support of Motion in limine 7.	1.10
04/07/2023	A A PEREZ	Continue drafting introduction to U.S. Sugar's reply in support of its motions in limine.	0.70
04/07/2023	A A PEREZ	Analyze and revise draft reply in support of U.S. Sugar's motions in limine as whole.	1.60
04/07/2023	C D STEKLOF	Communicate with mediator regarding factual update and potential second mediation with AIG (.5); communicate with Mr. Andrews regarding same and exchange various correspondence with client and mediator regarding same (.8) [REDACTED] [REDACTED] (2.9); communicate with Mr. Schwinghammer regarding amendments to disclosures and potential trial witnesses (.7).	4.90
04/08/2023	C D STEKLOF	[REDACTED] [REDACTED]	6.40
04/09/2023	C D STEKLOF	[REDACTED] [REDACTED]	4.60
04/10/2023	W ANDREWS	Review and supplement draft reply brief in support of several motions in limine; review deposition designations; [REDACTED].	1.80

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 CLIENT NAME: U.S. Sugar Corporation
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/10/2023	V CHAPUNOFF	Analyze time entries in underlying case invoices, identify invoices and time entries outside of relevant time period, supplement invoice tracking chart to reflect said analysis, correspond with client, Gunster, and FTI in connection with same, and analyze next steps in relation to same.	3.60
04/10/2023	V CHAPUNOFF	Analyze and update task list.	0.10
04/10/2023	V CHAPUNOFF	Analyze information regarding postponement of S. Hawkins' deposition, and supplement deposition calendar tracking chart to reflect updates.	0.30
04/10/2023	V CHAPUNOFF	Call chambers in relation to court reporter requirements for trial, and analyze next steps in connection with preparing trial exhibits and deposition designations.	0.30
04/10/2023	J L HUCKABA	Review correspondence from client and underlying counsel on invoices to prepare trial exhibits.	0.30
04/10/2023	J L HUCKABA	Draft email to client's accounting team regarding strategy for narrowing down invoices in connection with preparing trial exhibits.	0.30
04/10/2023	J L HUCKABA	[REDACTED]	0.20
04/10/2023	J L HUCKABA	[REDACTED]	0.70
04/10/2023	J L HUCKABA	[REDACTED]	2.00
04/10/2023	A A PEREZ	Analyze what information needs to be included in pretrial stipulation.	0.80
04/10/2023	A A PEREZ	[REDACTED]	0.90
04/10/2023	A A PEREZ	Develop strategy for what information to include in US Sugar's statement of the case in the pretrial stipulation.	0.70
04/10/2023	A A PEREZ	Draft introduction to pretrial stipulation.	0.30
04/10/2023	A A PEREZ	Outline pretrial stipulation.	1.00
04/10/2023	A A PEREZ	[REDACTED]	0.80
04/10/2023	A A PEREZ	Revise reply in support of US Sugar's motions in limine.	1.50

HUNTON ANDREWS KURTH LLP
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 FILE NUMBER: 054740.0000016

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/10/2023	C D STEKLOF	[REDACTED] (2.5); draft and revise reply in support of motions in limine (3.5); communicate with underlying counsel regarding potential participation as witnesses at trial (.7); address various issues related to litigation tasks and next steps (1.3).	8.00
04/11/2023	W ANDREWS	[REDACTED]	7.50
		[REDACTED]	
04/11/2023	V CHAPUNOFF	Identify and prepare trial exhibits.	2.00
04/11/2023	V CHAPUNOFF	Office conference with attorneys regarding preparing trial exhibits, pending invoice matters, and trial, and analyze next steps in relation to same.	1.10
04/11/2023	V CHAPUNOFF	Analyze information and next steps in connection with preparing for deposition designations, download and prepare for database documents received from S. Hawkins on April 11, 2023, and analyze information received from TSG in preparation for P. Ranis deposition.	0.50
04/11/2023	V CHAPUNOFF	Analyze information received from client, FTI, and Gunster regarding pending invoice matters, and prepare current list of pending invoice matters for delivery to Gunster and client.	1.20
04/11/2023	K L FAGLIONI	Revision of research memorandum regarding conflict of interest.	2.00
04/11/2023	J L HUCKABA	Evaluate strategy for following up on related and unrelated invoices and determining related time entries.	0.20
04/11/2023	J L HUCKABA	Evaluate strategy for finalizing invoices, correspondence, and expert reports for trial exhibits by deadline to exchange with opposing counsel.	0.90
04/11/2023	J L HUCKABA	Draft follow-up email to litigation consulting firm regarding outstanding time entries in connection with preparing trial exhibits.	0.20
04/11/2023	J L HUCKABA	Evaluate strategy for requesting leave of court to file a summary judgment motion on the reasonableness of fees.	0.40
04/11/2023	J L HUCKABA	Correspond with litigation consulting firm to procure detailed time entries for invoices paid in connection with the underlying litigation.	0.80
04/11/2023	J L HUCKABA	Evaluate strategy for seeking determination from the court on the reasonableness of fees.	0.60
04/11/2023	J L HUCKABA	Research precedent on motions for leave to file summary judgment motions under Florida law.	1.20

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/11/2023	J L HUCKABA	Draft summary of the standard for motion for leave to file a summary judgment motion.	0.20
04/11/2023	J L HUCKABA	Draft basis of jurisdiction section and revisions to introduction section of joint pretrial stipulation.	0.30
04/11/2023	A A PEREZ	Analyze if paying fees when an insured is abandoned by its insurers is <i>prima facie</i> evidence of the fees reasonableness.	2.20
04/11/2023	A A PEREZ	Analyze cases discussing method in which a Court can be asked to decide reasonableness of fees in underlying action.	2.10
04/11/2023	A A PEREZ	Analyze whether US Sugar should bring summary judgment motion regarding reasonableness of fees.	1.30
04/11/2023	A A PEREZ	Analyze what US Sugar would have to show to succeed on motion for leave to file summary judgment motion after deadline.	0.60
04/11/2023	A A PEREZ	Develop strategy for what to include on exhibit list.	0.50
04/11/2023	A A PEREZ	Revise concise statement of facts in proposed pretrial stipulation.	1.00
04/11/2023	A A PEREZ	[REDACTED] [REDACTED] [REDACTED]	1.20
04/11/2023	C D STEKLOF	Revise and finalize reply in support of motions in limine (3.0); [REDACTED] [REDACTED] [REDACTED] (1.2); address various issues related to upcoming litigation tasks (.9).	5.10
04/11/2023	S A WEEKS	Strategy on fee claim on summary judgment and pull cases from SD Fla on same.	1.50
04/12/2023	W ANDREWS	Review AIG opposition to US Sugar motions in limine and consider responsive arguments; review research regarding Dentons conflict and consider next steps; review and comment on draft correspondence to AIG regarding same; review research regarding potential new summary judgment motion on reasonableness of defense fees; [REDACTED].	3.50
04/12/2023	V CHAPUNOFF	Analyze information received from Gunster regarding pending invoice matters, and respond to same.	0.20
04/12/2023	V CHAPUNOFF	Supplement deadlines chart and task list to reflect updates.	0.30
04/12/2023	V CHAPUNOFF	Analyze documents produced by Defendant and create index to said documents, and supplement index to documents produced by U.S. Sugar.	3.00
04/12/2023	V CHAPUNOFF	Identify and prepare trial exhibits, and create trial exhibit list.	3.80

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/12/2023	V CHAPUNOFF	Prepare FTP link to all the materials sent to opposing counsel in connection with S. Hawkins' expert and rebuttal reports.	0.10
04/12/2023	K L FAGLIONI	Further revision of research memorandum regarding conflict of interest; preparation and revision of draft correspondence to Dentons regarding same.	1.50
04/12/2023	J L HUCKABA	Participate in weekly trial strategy meeting, including discussing motion for leave to file motion for summary judgment, preparing list of trial witnesses, [REDACTED]	1.10
04/12/2023	J L HUCKABA	Analyze precedent and federal rules on supplementing initial disclosures after the close of discovery.	0.90
04/12/2023	J L HUCKABA	[REDACTED]	0.20
04/12/2023	J L HUCKABA	[REDACTED]	0.70
04/12/2023	A A PEREZ	Analyze AIG's reply in support of its motions in limine.	0.70
04/12/2023	A A PEREZ	[REDACTED]	1.10
04/12/2023	A A PEREZ	Analyze best strategy for maximizing U.S. Sugar's recovery of fees.	1.60
04/12/2023	A A PEREZ	Begin drafting statement of undisputed facts for pretrial stipulation.	1.00
04/12/2023	A A PEREZ	Draft amended initial disclosures and cover email to opposing counsel.	0.60
04/12/2023	A A PEREZ	[REDACTED]	1.50
04/12/2023	A A PEREZ	Email Mike Perkins regarding trial support.	0.20
04/12/2023	A A PEREZ	Analyze whether specific documents should be included on exhibit list.	0.90
04/12/2023	C D STEKLOF	Communicate with team regarding case status and upcoming tasks in connection with litigation (1.0); revise and finalize correspondence to AIG regarding payment of undisputed amount and fees to date in coverage action (1.3); analyze memorandum regarding potential disqualification challenge to Dentons (1.0); exchange various correspondence regarding additional invoices to potentially include in damage model (.5); draft and revise proposed correspondence to AIG regarding refusal to remove Dentons as counsel (1.5); [REDACTED] (3.0); address various issues related to deposition scheduling and upcoming litigation tasks (.6).	8.90

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04/12/2023	S A WEEKS	Analysis of fee issue and cases determining fees as a matter of law.	0.90
04/13/2023	W ANDREWS	Meet with Mr. Hawkins to prepare for his deposition; [REDACTED] [REDACTED]	3.00
04/13/2023	V CHAPUNOFF	Draft deposition notice and request for production to Defendant's expert, P. Ranis.	1.20
04/13/2023	V CHAPUNOFF	Analyze information received from Gunster in connection with identifying irrelevant invoices, supplement invoice tracking chart to reflect updates (identify irrelevant invoice and proof of payment entries), identify and prepare trial exhibits, and create trial exhibit list.	4.30
04/13/2023	V CHAPUNOFF	Finalize and serve first amended 26(a)(1) disclosures.	0.20
04/13/2023	J L HUCKABA	[REDACTED] [REDACTED]	2.40
04/13/2023	J L HUCKABA	Analyze correspondence from underlying counsel on remaining invoices relating to greenhouse gas emissions.	0.30
04/13/2023	A A PEREZ	Develop strategy for how to deal with damages figure in Scott Hawkins expert report.	0.40
04/13/2023	A A PEREZ	Draft email to opposing counsel regarding meet and confer for pretrial stipulation.	0.20
04/13/2023	A A PEREZ	Analyze list of potential trial exhibits and provide comment to the same.	1.00
04/13/2023	A A PEREZ	Develop strategy for meet and confer regarding pre-trial stipulation.	0.80
04/13/2023	A A PEREZ	[REDACTED]	0.40
04/13/2023	A A PEREZ	Follow up on deposition designations.	0.20
04/13/2023	A A PEREZ	Revise and serve amended disclosures.	0.80
04/13/2023	C D STEKLOF	[REDACTED] (.5); conduct deposition prep session with Mr. Hawkins in advance of expert deposition (5.5); [REDACTED] 1.0); [REDACTED] (1.5); address various issues related to trial witnesses, amended disclosures, and various litigation tasks (2.6).	11.10

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04/14/2023	W ANDREWS	[REDACTED]; review trial witness strategy; review draft correspondence regarding Dentons conflict.	1.20
04/14/2023	V CHAPUNOFF	Revise draft deposition notice and request for production to Defendant's expert, P. Ranis, and serve.	0.40
04/14/2023	V CHAPUNOFF	Create trial exhibit list	4.80
04/14/2023	V CHAPUNOFF	Analyze information received from Gunster in connection with identifying irrelevant invoices, and next steps in relation to same.	0.20
04/14/2023	V CHAPUNOFF	Draft Plaintiff's Deposition Designations.	2.10
04/14/2023	J L HUCKABA	Evaluate strategy for meet and confer with opposing counsel regarding preparation of the joint pretrial stipulation.	0.30
04/14/2023	J L HUCKABA	[REDACTED]	0.20
04/14/2023	J L HUCKABA	[REDACTED]	0.20
04/14/2023	J L HUCKABA	[REDACTED]	0.20
04/14/2023	J L HUCKABA	Review correspondence on deposition designations in connection with trial preparation.	0.20
04/14/2023	A A PEREZ	Analyze revisions to depo designations in order to serve the same.	1.00
04/14/2023	A A PEREZ	[REDACTED]	0.50
04/14/2023	A A PEREZ	Revise email to opposing counsel regarding meet and confer.	0.10
04/14/2023	A A PEREZ	Analyze local rules, scheduling order, and Federal Rules of Civil Procedure to determine what the parties must confer about before trial.	1.00
04/14/2023	A A PEREZ	[REDACTED]	1.50
04/14/2023	A A PEREZ	Update team task list in preparation for trial.	0.40
04/14/2023	C D STEKLOF	[REDACTED] (.4); [REDACTED] (1.0); draft and revise proposed correspondence to AIG and AIG's counsel regarding Dentons conflict (1.2); [REDACTED] (1.0); communicate with Mr. Hawkins regarding lines of questioning for AIG expert witness (.4); review documents and prepare outline for deposition of AIG's fee expert (5.1).	9.10

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04/16/2023	W ANDREWS	Review discovery developments and proposed trial exhibits; [REDACTED]	1.50
04/16/2023	C D STEKLOF	Prepare for and outline deposition of AIG's fee expert	3.50
04/17/2023	W ANDREWS	Work on trial exhibit strategy; [REDACTED]	2.00
		[REDACTED] analyze new damage calculations to account for third-party payments and court order.	
04/17/2023	V CHAPUNOFF	Prepare for P. Ranis deposition, including uploading documents to AgileLaw database.	0.30
04/17/2023	V CHAPUNOFF	Analyze and update task list.	0.10
04/17/2023	V CHAPUNOFF	Identify and prepare trial exhibits, and create trial exhibit list.	1.10
04/17/2023	V CHAPUNOFF	Analyze information received from opposing counsel in connection with witnesses added to U.S. Sugar's amended disclosures, perform searches in U.S. Sugar's production for said witnesses, and prepare said production documents for input into database to assist counsel in preparing rebuttal to opposing counsel.	2.90
04/17/2023	V CHAPUNOFF	Download documents received from expert S. Hawkins on April 17, 2023, and prepare for input into database.	0.30
04/17/2023	V CHAPUNOFF	Analyze information received from FTI Consulting in connection with pending invoice matters, analyze next steps in relation to preparing damage calculations, prepare spreadsheets of deductions for invoices partially outside of relevant time period, re-check deductions for redacted time entries and prepare corresponding spreadsheets, calculate CoOp payments for relevant time period and prepare corresponding spreadsheets, and supplement master invoice tracking chart to reflect updated information.	7.80
04/17/2023	J L HUCKABA	Evaluate strategy for rebutting insurer's arguments that supplemental disclosures were untimely.	0.20
04/17/2023	J L HUCKABA	Analyze time entries from litigation consultant to determine entries to be included in damage amount.	0.60
04/17/2023	J L HUCKABA	Draft responses to inquiries regarding services rendered by third-party vendors during the underlying lawsuit in connection with finalizing trial exhibits.	0.20
04/17/2023	J L HUCKABA	Evaluate strategy for finalizing invoices in preparation of expert deposition.	0.50

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04/17/2023	J L HUCKABA	Evaluate strategy for drafting summary of related invoices, including invoices that have been reviewed for mistakes.	0.20
04/17/2023	J L HUCKABA	Draft summary of work performed on narrowing down invoices in connection with finalizing trial exhibits in advance of drafting joint pre-trial stipulation.	0.80
04/17/2023	J L HUCKABA	Analyze defamation and waste management invoices in connection with preparing trial exhibits.	0.50
04/17/2023	J L HUCKABA	Analyze corporate representative deposition in connection with removing unrelated invoices from trial exhibit list.	1.00
04/17/2023	J L HUCKABA	Analyze invoices identified in deposition transcript for potential mistakes, including checking invoices against trial exhibit list.	1.50
04/17/2023	A A PEREZ	Analyze draft trial exhibit list.	1.00
04/17/2023	A A PEREZ	Email opposing counsel regarding meet and confer.	0.20
04/17/2023	A A PEREZ	Analyze revisions to amended complaint.	0.50
04/17/2023	A A PEREZ	Analyze what tasks need to be completed in preparation for trial.	0.50
04/17/2023	C D STEKLOF	Review documents and outline deposition of AIG fee expert	7.20
04/18/2023	W ANDREWS	Review new damage calculations based on new documents from client and outline approach for Mr. Hawkins' testimony regarding same; [REDACTED] conference call with Mr. Kurtz regarding same.	2.00
04/18/2023	V CHAPUNOFF	Analyze docket entries 75-81 related to U.S. Sugar's supplemental authority, both parties' motions in limine, order on Defendant's motion for summary judgment, and U.S. Sugar's deposition designations, and supplement court pleadings index to reflect same.	0.30
04/18/2023	V CHAPUNOFF	Analyze information sent to and from trial consultants regarding trial preparation.	0.10
04/18/2023	V CHAPUNOFF	Identify and prepare trial exhibits, and create trial exhibit list.	0.70
04/18/2023	V CHAPUNOFF	Create spreadsheet for expert S. Hawkins with updated figures, draft and send correspondence to S. Hawkins regarding same, analyze next steps in connection with preparing damage calculations, and analyze information sent to and from client regarding same.	1.60
04/18/2023	V CHAPUNOFF	Analyze and update task list.	0.20

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04/18/2023	V CHAPUNOFF	Prepare for P. Ranis deposition, including uploading documents to AgileLaw database.	0.10
04/18/2023	J L HUCKABA	Analyze fee expert's handwritten notes in connection with producing notes in response to insurer's requests for production.	0.20
04/18/2023	J L HUCKABA	Draft email to expert witness regarding case law on the presumption of reasonableness of fees where the policyholder pays the fees.	0.20
04/18/2023	J L HUCKABA	Analyze discovery documents and depositions in connection with determining whether trial witnesses were made known to the insurer during the discovery process.	0.90
04/18/2023	J L HUCKABA	Analyze precedent on when information is otherwise made available to a party during discovery in connection with supplementing initial disclosures.	1.50
04/18/2023	J L HUCKABA	Evaluate strategy for reviewing expert's handwritten notes in connection with deposition duces tecum.	0.20
04/18/2023	J L HUCKABA	Analyze correspondence in connection with determining strategy for preparing fee expert for deposition.	0.20
04/18/2023	A A PEREZ	Participate in teleconference with client regarding damages and amended complaint.	0.40
04/18/2023	A A PEREZ	Analyze key take aways from Mr. Ranis' deposition in order to prepare for trial.	0.40
04/18/2023	A A PEREZ	Participate in Mr. Ranis' deposition.	8.50
04/18/2023	C D STEKLOF	Review new documents produced by AIG's expert just prior to deposition (1.0); conduct deposition of AIG's fee expert (9.4); communicate with client regarding next steps related to amended complaint and related matters (.6); analyze and exchange various correspondence related to updated fee calculations for trial (1.5).	12.50
04/19/2023	W ANDREWS	Obtain report on Hawkins deposition; [REDACTED]	1.50
04/19/2023	V CHAPUNOFF	Prepare documents produced in response to C&I's Request for Production to expert S. Hawkins for delivery to opposing counsel via FTP link and for input into databases, and prepare documents produced in response to U.S. Sugar's Request for Production to expert P. Ranis for input into database.	0.60
04/19/2023	V CHAPUNOFF	Analyze Golder invoices and create spreadsheet identifying invoices for relevant time period, and analyze next steps in connection with same.	0.70
04/19/2023	J L HUCKABA	Draft pleadings, issues of law, and trial witness sections of proposed pre-trial joint stipulation.	1.10

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04/19/2023	A A PEREZ	Analyze whether Golder invoices should be included in damages calculation.	0.40
04/19/2023	A A PEREZ	Continue drafting U.S. Sugar's proposed pretrial stipulation.	2.90
04/19/2023	C D STEKLOF	Travel to and defend deposition of U.S. Sugar fee expert	12.30
04/20/2023	W ANDREWS	Review strategy regarding amending bad faith complaint; review case law from Mr. Boyle.	1.00
04/20/2023	V CHAPUNOFF	Identify and prepare trial exhibits, and create trial exhibit list.	1.90
04/20/2023	V CHAPUNOFF	Analyze next steps in connection with preparing for upcoming deadlines.	0.10
04/20/2023	J L HUCKABA	Evaluate strategy for team meeting to address upcoming pretrial deadlines, such as the joint pre-trial stipulation.	0.20
04/20/2023	J L HUCKABA	Analyze expert witness rebuttal report to determine whether the names of the trial witnesses were made known to the insurer during discovery.	0.20
04/20/2023	A A PEREZ	Prepare for and participate in meet and confer with opposing counsel regarding amended complaint, amended initial disclosures, and pretrial stipulation.	1.70
04/20/2023	A A PEREZ	Revise pretrial stipulation to incorporate C. Steklof's comments.	0.30
04/20/2023	A A PEREZ	Develop strategy for meeting upcoming deadlines.	0.50
04/20/2023	A A PEREZ	Analyze what additional documents need to be added to exhibit list.	0.70
04/20/2023	A A PEREZ	Analyze issues that need to be addressed with opposing counsel regarding pretrial stipulation.	0.70
04/20/2023	C D STEKLOF	[REDACTED] (4.2); meet and confer with opposing counsel regarding joint pretrial stipulation and communicate with Ms. Perez regarding next steps (.7).	4.90
04/21/2023	W ANDREWS	[REDACTED] review and supplement proposed draft pretrial stipulation; review proposed trial exhibit list.	3.50
04/21/2023	V CHAPUNOFF	[REDACTED]	0.40
04/21/2023	J L HUCKABA	[REDACTED]	0.40
04/21/2023	A A PEREZ	[REDACTED]	1.50
04/21/2023	A A PEREZ	[REDACTED]	1.20

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04/21/2023	A A PEREZ	[REDACTED]	0.80
04/21/2023	A A PEREZ	Analyze quote from Gravity Stack in preparation for trial.	0.50
04/21/2023	A A PEREZ	Develop strategy for trial given upcoming deadlines.	0.40
04/21/2023	C D STEKLOF	[REDACTED]	0.40
04/23/2023	J L HUCKABA	Analyze insurer's objections and counter-designations to deposition designations of insurer's corporate representative.	0.90
04/23/2023	J L HUCKABA	Review correspondence on the presumption of reasonableness in connection with drafting proposed jury instructions.	0.10
04/24/2023	W ANDREWS	Review trial preparation, draft pretrial stipulations and proposed trial witnesses and exhibits; review AIG counter deposition designations and objections; obtain reports on expert witness depositions and consider follow up strategy; review deposition designation strategy.	2.60
04/24/2023	V CHAPUNOFF	Analyze next steps in connection with requesting expedited transcripts for experts P. Ranis and S. Hawkins, and prepare and send said requests.	0.30
04/24/2023	V CHAPUNOFF	Identify and prepare trial exhibits, supplement trial exhibit list to reflect updates, draft email to client regarding pending Golder invoice matters, and analyze next steps in connection with revising trial outline.	1.00
04/24/2023	V CHAPUNOFF	Attend conference call with attorneys to discuss key matters in relation to preparing joint trial stipulation, trial outline, and trial exhibits.	1.00
04/24/2023	J L HUCKABA	Evaluate strategy for analyzing fee expert exhibits for consistency.	0.20
04/24/2023	J L HUCKABA	Analyze correspondence relating to ordering and analyzing expert deposition transcripts in connection with trial preparation.	0.20
04/24/2023	J L HUCKABA	Analyze precedent on appropriate jury instructions on the reasonableness of fees under Florida law.	2.50
04/24/2023	J L HUCKABA	Draft summary of outstanding tasks and deadlines in connection with trial preparation.	0.40
04/24/2023	J L HUCKABA	Review comments in draft in connection with drafting revisions to the pretrial stipulation.	0.10
04/24/2023	J L HUCKABA	Analyze whether a court's holding on the duty to defend affects whether arguments on conditions precedent can be raised as to bar coverage.	0.10

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04/24/2023	J L HUCKABA	Evaluate strategy for trial preparation, including revisions to the pretrial stipulation and issues to research from expert deposition.	1.10
04/24/2023	J L HUCKABA	Analyze model jury instructions from Florida Supreme Court in connection with drafting jury instructions.	0.70
04/24/2023	A A PEREZ	Revise trial outline to incorporate additional evidence and Walter Andrews' comments.	4.50
04/24/2023	A A PEREZ	Develop strategy for how to proceed with deposition designations, exhibit list, and pretrial stipulation.	2.00
04/24/2023	A A PEREZ	Revise proposed pretrial stipulation.	1.80
04/24/2023	A A PEREZ	Begin drafting objections to AIG's counter designations.	0.80
04/24/2023	C D STEKLOF	Communicate with team regarding litigation status and upcoming tasks to prepare for trial (1.0); review and revise joint pretrial stipulation and address various issues related to exhibit list, trial witnesses, and upcoming deadlines (3.7).	4.70
04/25/2023	W ANDREWS	Review strategy regarding trial exhibits; review strategy regarding pretrial stipulation; review strategy regarding damages calculations.	2.00
04/25/2023	V CHAPUNOFF	Identify and analyze Hawaii-related documents received from client and prepare for input into database.	0.40
04/25/2023	V CHAPUNOFF	Analyze and revise trial outline and task list, identify trial exhibits, and supplement trial exhibit list to reflect updates.	5.20
04/25/2023	J L HUCKABA	Draft follow-up email on deadline to appeal court's order for partial summary judgment.	0.10
04/25/2023	J L HUCKABA	Evaluate strategy for determining deadline for interlocutory appeal of partial summary judgment order.	0.10
04/25/2023	J L HUCKABA	Draft summary of breach of contract model jury instructions in connection with preparing proposed jury instructions.	0.10
04/25/2023	J L HUCKABA	Evaluate strategy for locating document in related Hawaii litigation in connection with finalizing trial exhibits.	0.20
04/25/2023	J L HUCKABA	Research precedent on the requirement of producing documents in order to preserve the ability to use the documents as trial exhibits.	1.70
04/25/2023	J L HUCKABA	Evaluate strategy for supplementing production of documents supporting breach of contract claim and evidencing amount of damages.	0.10

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04/25/2023	J L HUCKABA	Analyze correspondence on formal written agreements between client and other affiliated entities to determine fee sharing in connection with finalizing damage amount and trial exhibits.	0.10
04/25/2023	A A PEREZ	Analyze Court's order on motion for summary judgment in order to revise pretrial stipulation.	0.50
04/25/2023	A A PEREZ	Email opposing counsel regarding pretrial stipulation.	0.30
04/25/2023	A A PEREZ	Review emails from defense counsel regarding the Hawaii Action.	0.80
04/25/2023	A A PEREZ	Review articles available to US Sugar before underlying lawsuit was filed regarding the Hawaii Action.	0.50
04/25/2023	A A PEREZ	Analyze whether US Sugar should produce all documents it seeks to currently rely on at trial.	1.00
04/25/2023	A A PEREZ	Analyze research regarding producing documents we want to rely on at trial.	0.40
04/25/2023	A A PEREZ	Revise trial outline	1.80
04/25/2023	A A PEREZ	Analyze discovery responses in order to determine if we need to supplement.	0.80
04/25/2023	A A PEREZ	Revise U.S. Sugar's statement of the case in pretrial stipulation.	1.50
04/25/2023	A A PEREZ	Revise joint sections of proposed joint pretrial stipulation.	1.30
04/25/2023	K M RUDD	Research responses to objections to deposition designations that have been filed in cases pending before Judge Scola in the Southern District of Florida.	1.10
04/25/2023	C D STEKLOF	Communicate regarding efforts to compile additional invoices to supplement exhibit list and draft correspondence to client regarding same (.8); review materials received in connection with Hawaii action and draft correspondence regarding review of same to incorporate on exhibit list (1.0); analyze issues related to need to produce documents in order to utilize at trial (.7); revise joint pretrial stipulation and communicate with team regarding revisions to same before sharing with opposing counsel (2.0); address various issues related to joint pretrial stipulation, shared invoices with Florida Sugarcane League, and upcoming pretrial deadlines (2.0).	6.50
04/26/2023	W ANDREWS	Review damages categories and evidentiary support for same; continue working on pretrial stipulations; review draft voir dire questions; review potential trial exhibits; review witness strategy regarding Hawaii action.	2.00

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04/26/2023	V CHAPUNOFF	Review and prepare for databases S. Hawkins and P. Ranis deposition transcript and exhibit files, prepare and send S. Hawkins errata sheet request, supplement deposition exhibits index, and supplement deponent tracking log.	3.10
04/26/2023	V CHAPUNOFF	Identify and prepare trial exhibits, supplement trial exhibit list to reflect updates, analyze information sent to and from client regarding obtaining payment information for Golder invoices for use as trial exhibits, analyze and supplement deadlines tracking chart and task list to reflect updates, and analyze next steps in connection with trial exhibits and preparation.	3.00
04/26/2023	J L HUCKABA	Evaluate strategy for analyzing filings in Hawaii litigation docket to be produced in supplemental production to insurers' requests for production.	0.20
04/26/2023	J L HUCKABA	Analyze docket for filings relevant to breach of contract claim in connection with supplementing document production.	0.90
04/26/2023	J L HUCKABA	Analyze articles on Hawaii cane burning litigation to determine which articles to include as exhibits.	2.70
04/26/2023	J L HUCKABA	Evaluate strategy for drafting jury instructions on reasonableness of attorney fees.	0.20
04/26/2023	J L HUCKABA	Analyze precedent from the Eleventh Circuit on across-the-board fee reductions.	0.20
04/26/2023	J L HUCKABA	Review proposed voir dire questions to determine revisions.	0.10
04/26/2023	J L HUCKABA	Analyze precedent on the waiver of objections not made during the deposition.	1.10
04/26/2023	A A PEREZ	Continue drafting U.S. Sugar's responses to AIG's objections to deposition designation.	2.80
04/26/2023	A A PEREZ	Participate in teleconference with U.S. Sugar regarding trial preparation.	0.80
04/26/2023	A A PEREZ	Analyze whether AIG can object to questions in deposition designations that it did not object to at the deposition.	0.90
04/26/2023	A A PEREZ	Analyze whether certain exhibits should be marked confidential.	0.30
04/26/2023	A A PEREZ	Analyze and revise proposed Voir dire questions.	1.60
04/26/2023	A A PEREZ	Revise U.S. Sugar's proposed Voir dire questions.	0.60
04/26/2023	A A PEREZ	Analyze potential evidentiary issues that may arise at trial and develop strategy for how to deal with those.	1.10

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04/26/2023	C D STEKLOF	Communicate with team regarding joint pretrial stipulation (.5); communicate with client regarding efforts to compile proof of payment for Golder invoices (.3); communicate with client regarding same and various issues related to trial prep (.6); draft correspondence to opposing counsel regarding status of attorneys' fees payment for coverage matter (.3); review various portions of Hawaii litigation docket and relevant articles for potential inclusion in exhibit list (1.0); review and revise potential voir dire questions for submission to Court and communicate regarding same (1.3); review and revise responses in support of AIG deposition designations (2.5); draft and revise joint pretrial stipulation and address various issues related to upcoming deadlines (2.6).	9.10
04/27/2023	W ANDREWS	Work on trial outline.	0.70
04/27/2023	V CHAPUNOFF	Identify and prepare trial exhibits and supplement trial exhibit list to reflect updates.	0.40
04/27/2023	V CHAPUNOFF	Analyze information sent to and from expert S. Hawkins regarding trial preparation.	0.20
04/27/2023	V CHAPUNOFF	Analyze next steps in connection with e-filing proposed Voir Dire Questions.	0.10
04/27/2023	V CHAPUNOFF	Draft Notice of Filing Responses to C&I's Objections to Deposition Designations, and U.S. Sugar's Objections to Counter-Designations.	0.50
04/27/2023	J L HUCKABA	Analyze filings in Hawaii litigation and articles related to the litigation to determine how the lawsuit ended the sugar industry in Hawaii.	0.30
04/27/2023	J L HUCKABA	Evaluate strategy for preparing witnesses, including determining witness availability, in connection with trial preparation.	0.20
04/27/2023	J L HUCKABA	Analyze standard form jury instructions on reasonable fees in connection with drafting proposed jury instructions.	0.30
04/27/2023	A A PEREZ	Analyze AIG's revisions to proposed joint pretrial stipulation.	2.10
04/27/2023	A A PEREZ	Prepare for and participate in meet and confer regarding the proposed joint pretrial stipulation.	1.00
04/27/2023	A A PEREZ	Draft US Sugar's pretrial stipulation under local rule 16(f).	2.80
04/27/2023	A A PEREZ	Analyze what information Scott Hawkins can provide in order to assist with demonstratives at trial.	0.70
04/27/2023	A A PEREZ	Finalize U.S. Sugar's proposed voir dire questions.	0.50

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04/27/2023	C D STEKLOF	Review and analyze trial outline and inclusion of relevant exhibits (1.0); analyze various articles and related materials for addition to exhibit list (1.0); draft correspondence to team regarding call with client on various trial matters (.4); draft and revise proposed joint pretrial stipulation to share with opposing counsel (2.0); communicate regarding various issues related to upcoming filings and strategic approach to same (1.0); conduct conferral regarding joint pretrial stipulation and communicate regarding next steps in light of inability to reach agreement (1.3); draft and revise unilateral pretrial stipulation in light of inability to reach agreement with AIG (2.3).	9.00
04/28/2023	W ANDREWS	Work on pretrial stipulations; review AIG filings and consider next steps in light of same.	2.50
04/28/2023	V CHAPUNOFF	Review draft trial exhibit list, analyze information sent to and from opposing counsel regarding joint pretrial stipulation and trial exhibit list, and analyze next steps in connection with same.	1.30
04/28/2023	J L HUCKABA	Draft responses and objections to deposition designations and counter-designations of deposition testimony from insurer's corporate representative.	1.30
04/28/2023	J L HUCKABA	Analyze exhibits to experts deposition to determine law firms associated with the partners and associates in reasonable fee cases.	0.20
04/28/2023	J L HUCKABA	Draft hearsay exception and exemption responses to insurer's objections to deposition designations of their corporate representative.	1.00
04/28/2023	J L HUCKABA	Evaluate strategy for withdrawing objections to counter-designations for insurer's corporate representative deposition testimony.	0.10
04/28/2023	J L HUCKABA	Research precedent on suits involving client that involve the reasonableness of fees.	0.40
04/28/2023	A A PEREZ	Analyze proposed pretrial stipulation circulated by AIG.	0.50
04/28/2023	A A PEREZ	Develop strategy for responding AIG's proposed stipulation.	1.20
04/28/2023	A A PEREZ	Analyze which exhibits US Sugar will offer at trial.	0.60
04/28/2023	A A PEREZ	Revise exhibit list in order to circulate the same to opposing counsel.	1.30
04/28/2023	A A PEREZ	Further revise unilateral pretrial stipulation.	0.50
04/28/2023	A A PEREZ	Revise U.S. Sugar's pretrial disclosures.	0.50
04/28/2023	A A PEREZ	Revise U.S. Sugar's responses to AIG's objections to deposition designation.	3.20
04/28/2023	A A PEREZ	Prepare pretrial disclosures for filing.	0.30

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114032863
DATE: 05/18/2023
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
04/28/2023	A A PEREZ	Prepare responses to objections to deposition designations for filing.	0.40
04/28/2023	A A PEREZ	Prepare unilateral pretrial stipulation for filing.	0.30
04/28/2023	A A PEREZ	Prepare voir dire questions for filing.	0.20
04/28/2023	C D STEKLOF	Draft and revise unilateral pretrial stipulations, Rule 26(a)(3) disclosures, responses in support of deposition designations, and proposed voir dire questions and coordinate filing of same	9.80
04/30/2023	C D STEKLOF	Draft correspondence to client regarding trial logistics (.7); draft correspondence regarding appropriate response to Akerman's request to withdraw from case (.4); draft and revise proposed correspondence regarding AIG's failure to pay attorneys' fees and costs in coverage litigation (1.1).	2.20
TOTAL HOURS			531.40

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	59.40	1,247.00	74,071.80
K L FAGLIONI	Partner	3.50	1,080.00	3,780.00
C D STEKLOF	Counsel	176.70	869.00	153,552.30
J L HUCKABA	Associate	63.40	536.00	33,982.40
A A PEREZ	Associate	134.80	779.00	105,009.20
S A WEEKS	Associate	2.40	729.00	1,749.60
V CHAPUNOFF	Paralegal	89.20	333.00	29,703.60
K M RUDD	Librarian	2.00	378.00	756.00
TOTAL FEES (\$)				402,604.90

FOR COSTS ADVANCED AND EXPENSES INCURRED:

CODE	DESCRIPTION	AMOUNT
E106	Online Research	241.14
E110	Out-of-Town Travel	129.98
E111	Meals	1,209.12
E115	Deposition Transcripts	2,064.80
E116	Trial Transcripts	1,250.00
TOTAL CURRENT EXPENSES (\$)		4,895.04

INVOICE SUMMARY:

Current Fees:	\$ 402,604.90
Current Charges:	4,895.04
CURRENT INVOICE AMOUNT DUE:	\$ 407,499.94



HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114033020
DATE: 06/30/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending May 31, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 501,787.90
Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 501,787.90

TO RECEIVE PROPER CREDIT, PLEASE ATTACH REMITTANCE COPY WITH PAYMENT.

FOR BILLING INQUIRIES, PLEASE CALL: 804-788-8555

To Pay By Mail:
HUNTON ANDREWS KURTH LLP
PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: 001458094
ABA Transit: 061000104
Swift Code (International): SNTRUS3A
Information with Wire: File: 054740.0000016, Inv: 114033020, Date: 06/30/2023



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INVOICE SUMMARY-REMITTANCE PAGE

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114033020
DATE: 06/30/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending May 31, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

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PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: 001458094
ABA Transit: 061000104
Swift Code (International): SNTRUS3A
Information with Wire: File: 054740.0000016, Inv: 114033020, Date: 06/30/2023

HUNTON ANDREWS KURTH

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WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE DETAIL

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114033020
DATE: 06/30/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH MAY 31, 2023:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/01/2023	W ANDREWS	Review and supplement letter to AIG regarding fees; review AIG motion to strike US Sugar witnesses.	0.80
05/01/2023	V CHAPUNOFF	Attend call with attorneys and expert S. Hawkins, and analyze information sent to and from Mr. Hawkins, in connection with identifying various types of invoices for use at trial.	0.20
05/01/2023	V CHAPUNOFF	Analyze docket entries 82-93 related to motion for leave to amend complaint, both parties' objections and counter-designations, proposed pretrial stipulations, proposed voir dire questions, and pretrial disclosures, and Akerman's motion to withdraw as counsel, and supplement court pleadings index to reflect same.	0.60
05/01/2023	J L HUCKABA	Evaluate strategy for briefing Florida law on the ability to make across the board cuts when determining the reasonableness of fees.	0.30
05/01/2023	J L HUCKABA	Analyze local rules and scheduling order on requirements for proposed jury instructions.	0.30
05/01/2023	J L HUCKABA	Analyze precedent on compensable attorneys fees under Florida law in connection with drafting jury instructions.	1.70
05/01/2023	J L HUCKABA	Research precedent on Florida standard jury instructions model instruction 12(c).	0.50
05/01/2023	J L HUCKABA	Analyze precedent on appropriateness of across-the-board reductions under Florida law.	3.30
05/01/2023	J L HUCKABA	Draft summary of precedent on the appropriateness of across-the-board percentage reductions under Florida law.	1.00

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/01/2023	A A PEREZ	Develop strategy for how to proceed with case in light of AIG's recent filings (.7); analyze AIG's filings from April 28, 2023 (.7); email opposing counsel regarding exchanging jury instructions (.3); analyze cases discussing burden of proof for fees in order to draft jury instructions (.9); prepare for and participate in teleconference with Scott Hawkins regarding exhibits (1.1); draft jury instructions in support of US Sugar's claim (4.6); analyze 11th Circuit pattern jury instructions (1.0).	9.30
05/01/2023	K M RUDD	Research jury instructions that have been submitted to Judge Scola in the last 2 years in any civil case.	0.90
05/01/2023	K M RUDD	Research jury instructions that have been submitted to Judge Scola and approved by the Court in the last 5 years in a civil case	0.50
05/01/2023	C D STEKLOF	Communicate with Ms. Huckaba regarding research into various issues (.3); communicate with Mr. Hawkins regarding support for jury instructions and trial exhibits (.8); communicate regarding various issues related to trial tasks and compilation of jury instructions (1.0); analyze pretrial stipulation and exhibit list filed by AIG (.7); review expert deposition transcript to draft demand for additional materials from Mr. Ranis (2.0); address various issues related to potential withdrawal of Akerman from matter (1.0); address various pretrial issues (.6).	6.40
05/02/2023	W ANDREWS	Review next step in Denton's conflict issue and attempted withdrawal by Akerman; review trial strategy with Mr. Kurtz; review research regarding defense costs; work on opposition to AIG motion to strike.	2.00
05/02/2023	V CHAPUNOFF	Analyze task list, information sent to and from Mr. Hawkins in connection with identifying various types of invoices for use at trial, and next steps in connection with preparing trial exhibits and witnesses.	0.20
05/02/2023	K L FAGLIONI	Correspondence regarding proposed response to Akerman's motion for leave to withdraw and conference with Cary Steklof regarding same.	0.50
05/02/2023	J L HUCKABA	Analyze and review insurer's motion to strike disclosure of witnesses.	0.50
05/02/2023	J L HUCKABA	Analyze jury instructions submitted to federal district court judge in last two years in a civil case and jury instructions submitted and approved to the same judge in the last five years.	0.20
05/02/2023	J L HUCKABA	Evaluate strategy for drafting opposition to insurer's motion to strike disclosure of witnesses.	0.50

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/02/2023	J L HUCKABA	Analyze precedent on the factors considered in determining the reasonableness of fees in connection with preparing proposed jury instructions.	0.20
05/02/2023	J L HUCKABA	Analyze previously submitted jury instructions and accompanying authority submitted in insurance cases in the southern district of Florida.	1.40
05/02/2023	A A PEREZ	Analyze AIG's motion to strike witnesses and develop strategy for response (1.0); revise jury instructions (4.7);	5.70
05/02/2023	K M RUDD	Research jury instructions that have been submitted to Judge Scola and approved by the Court in any insurance case.	1.90
05/02/2023	C D STEKLOF	Communicate regarding various issues related to jury instructions (1.3); communicate regarding opposition to insurer's motion to strike trial witnesses (.5); communicate with client regarding various issues related to trial preparation and trial (.8); finalize request for documents from Mr. Ranis and send same (.5); address various issues related to jury instructions, pending motions, litigation tasks, and trial preparation (2.6).	5.70
05/03/2023	W ANDREWS	Work on jury instructions and review case law regarding same; work on witness outlines; review potential trial exhibits; work on opposition to motion to strike US Sugar witnesses; review strategy regarding US Sugar client representative at trial.	5.50
05/03/2023	V CHAPUNOFF	Analyze C&I's trial exhibit list, identify exhibits on C&I's trial exhibit list not on U.S. Sugar's trial exhibit list, prepare said identified exhibits for input into database, and create corresponding exhibit tracking charts.	3.00
05/03/2023	V CHAPUNOFF	Attend conference call with attorneys regarding jury instructions, response to motion to strike U.S. Sugar's witnesses, witness outline, trial exhibits, and trial strategy.	1.20
05/03/2023	J L HUCKABA	Analyze precedent on fee reductions in connection with rebutting insurer's expert's testimony at trial.	0.20
05/03/2023	J L HUCKABA	Analyze strategy for utilizing duty to defend reasonable fees cases in drafting jury instructions.	0.40
05/03/2023	J L HUCKABA	Evaluate strategy for objecting to insurer's exhibits, preparing demonstrative exhibits of invoices, preparing trial witnesses, and finalizing jury instructions.	1.40
05/03/2023	J L HUCKABA	Analyze federal rules of evidence to determine deadline to produce demonstratives to opposing counsel.	0.20

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/03/2023	J L HUCKABA	Analyze precedent on the types of facts that can be judicially noticed in connection with drafting jury instructions.	3.10
05/03/2023	J L HUCKABA	Draft memorandum synthesizing precedent from Florida federal courts on the types of facts subject to judicial notice.	0.40
05/03/2023	A A PEREZ	Analyze research regarding judicial notice (.3); analyze whether U.S. Sugar should object to Defendant's exhibit list (.7); analyze whether demonstratives must be included in exhibit list (.6); develop strategy for Bunker's witness outline (.8); revise jury instructions to incorporate Walter Andrews and Cary Steklof's comments (5.8); analyze topics that need to be resolved in preparation for trial (1.5).	9.70
05/03/2023	C D STEKLOF	Communicate regarding various issues related to draft jury instructions (.8); exchange various correspondence regarding issues related to trial preparation (1.0); communicate with team regarding jury instructions, trial witnesses, pending motions, and trial tasks (1.3); analyze issues related to preparation of outlines for trial witnesses (.5); review draft jury instructions and draft proposed revisions and comments to same (3.1).	6.70
05/04/2023	W ANDREWS	Work on draft jury instructions and legal research regarding same; telephone call with Mr. Kurtz regarding litigation strategy; review potential objections to AIG proposed trial exhibits and pretrial stipulations; review Ranis deposition transcript; review outline of brief in opposition to motion to strike; outline new summary judgment motion on duty to defend; outline strategy regarding Dentons conflict.	7.00
05/04/2023	V CHAPUNOFF	Analyze C&I's trial exhibit list, identify exhibits on C&I's trial exhibit list not on U.S. Sugar's trial exhibit list, prepare said identified exhibits for input into database, and create corresponding exhibit tracking charts.	3.90
05/04/2023	A DEFIELD	Conference with Mr. Andrews re: jury instructions research and burden shifting; provide instruction to team on research needed.	1.10
05/04/2023	A DEFIELD	Review jury instructions and verdict form; revise and supplement; review case law cited therein as part of revision process.	2.60

HUNTON ANDREWS KURTH LLP
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/04/2023	A DEFIELD	Review prior court orders, answer, complaint, and pre-trial stipulations to determine whether to file motion; research and analysis on filing motion for summary judgment on limited issue; review case law on reasonableness issue.	4.90
05/04/2023	A DEFIELD	Outline motion and next steps.	0.80
05/04/2023	A DEFIELD	Begin research for motion re: insurer's duty to pay full reimbursement of underlying suit costs.	2.00
05/04/2023	J L HUCKABA	Research precedent nationwide on reasonable fees in cases where the insurer wrongfully refused to defend.	2.00
05/04/2023	J L HUCKABA	Analyze precedent nationwide on reasonable fees where an insurer wrongfully refuses to defend.	1.50
05/04/2023	J L HUCKABA	Analyze arguments from the insurer's expert on why the fees paid in the underlying lawsuit were unreasonable in connection with trial preparation.	0.20
05/04/2023	J L HUCKABA	Evaluate strategy for instructing jury on the burden of establishing payment of fees and the burden of establishing reasonableness of fees.	0.80
05/04/2023	J L HUCKABA	Draft outline of response in opposition to insurer's motion to strike witnesses disclosed post-discovery.	0.70
05/04/2023	J L HUCKABA	Analyze precedent cited in insurer's motion to strike witnesses disclosed post-discovery in connection with drafting the response in opposition to the motion.	0.90
05/04/2023	J L HUCKABA	Draft legal memorandum of law section of response in opposition to insurer's motion to strike witnesses disclosed post-discovery.	1.00
05/04/2023	J L HUCKABA	Draft introduction section of response in opposition to insurer's motion to strike witnesses disclosed post-discovery.	0.50
05/04/2023	J L HUCKABA	Draft argument section of response in opposition to insurer's motion to strike witnesses disclosed post-discovery.	2.50
05/04/2023	A A PEREZ	Analyze whether US Sugar should file motion for damages (.6); develop strategy for what to include in US Sugar's verdict form (.8); draft US Sugar's objections to AIG's Exhibit list (1.6); revise US Sugar's proposed verdict form (.5); draft US Sugar's proposed verdict form (.7); analyze whether US Sugar should file motion for summary judgment based on newly raised issues of law (1.1); further revise jury instructions to incorporate A. DeField's comments (2.3); revise jury instructions to incorporate W. Andrews comments (2.6).	10.20

HUNTON ANDREWS KURTH LLP
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/04/2023	K M RUDD	Research jury instructions filed in Balcor Real Estate Holdings, Inc. v. Walentas-Phoenix Corp., 73 F.3d 150, 153 (7th Cir. 1996), U.S. Bank Nat. Ass'n v. Long, No. 13-C-0257, 2014 WL 3044617, at *2 (E.D. Wis. July 3, 2014), Taco Bell Corp. v. Cont'l Cas. Co., 388 F.3d 1069, 1075-76 (7th Cir. 2004), Knoll Pharm. Co. v. Auto. Ins. Co. of Hartford, 210 F. Supp. 2d 1017, 1024-25 (N.D. Ill. 2002), Medcom Holding Co. v. Baxter Travenol Labs., Inc., 200 F.3d 518, 520 (7th Cir. 1999) and Kallman v. Radioshack Corp., 315 F.3d 731, 742 (7th Cir. 2002).	0.70
05/04/2023	C D STEKLOF	Address various issues related to draft jury instructions and revisions to same (2.0); analyze appropriate opposition to Akerman's motion to withdraw (1.0); analyze and communicate regarding potential strategy to seek total fees through summary judgment motion (2.0); complete tasks related to witness preparation and upcoming trial (2.9).	7.90
05/05/2023	W ANDREWS	Work on brief in opposition to motion to strike; work on draft jury instructions; work on opposition to Akerman motion to withdraw; work on summary judgment motion on defense expenses; review Scott Hawkins deposition transcript for possible corrections; review AIG proposed draft jury instructions; review correspondence from AIG regarding Denton's conflict; review correspondence from AIG re attorney fees.	9.00
05/05/2023	V CHAPUNOFF	Analyze and revise task list, and analyze next steps in connection with preparing objections to C&I's trial exhibits.	0.30
05/05/2023	V CHAPUNOFF	Analyze information sent to and from client, T. Bishop (Mayer Brown), G. Schwinghammer (Gunster), and expert S. Hawkins on May 5, 2023, regarding witness trial preparation, identify and prepare ebinders of documents for review by Mr. Bishop and Mr. Schwinghammer, and prepare said documents for delivery via FTP site.	0.80
05/05/2023	A DEFIELD	Review correspondence with experts on expert preparation; review revised jury instructions; Review case law and continue research in order to draft dispositive motion, motion for leave, and statement of material facts; draft motion and incorporated memorandum of law; revise motion.	7.90
05/05/2023	K L FAGLIONI	Conference and correspondence with Cary Steklaf regarding response to Akerman's motion for leave to withdraw; review of motion and related pleadings; preparation of draft response.	2.50
05/05/2023	J L HUCKABA	Review correspondence on strategy for witness preparation.	0.10

HUNTON ANDREWS KURTH LLP
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FILE NUMBER: 054740.0000016

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DATE: 06/30/2023
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/05/2023	J L HUCKABA	Research precedent on the standard for substantially justified within the meaning of Rule 37(c) under Florida law.	1.60
05/05/2023	J L HUCKABA	Revise draft response in opposition to insurer's motion to strike to include cites to exhibits and Florida law.	1.00
05/05/2023	J L HUCKABA	Draft revisions to response in opposition to insurer's motion to strike witnesses disclosed post-discovery.	1.80
05/05/2023	J L HUCKABA	Draft revisions to argument section of response in opposition to insurer's motion to strike witnesses disclosed post-discovery.	1.50
05/05/2023	J L HUCKABA	Draft summary of material facts section of response in opposition to insurer's motion to strike witnesses disclosed post-discovery.	0.50
05/05/2023	J L HUCKABA	Analyze invoices and exhibits to expert's deposition for identification of individuals named in witness list.	1.60
05/05/2023	J L HUCKABA	Draft summary of next steps for witness outlines, drafting opposition to motion to strike, and witness preparation.	0.20
05/05/2023	J L HUCKABA	Draft conclusion of response in opposition to motion to strike witnesses disclosed post-discovery.	0.20
05/05/2023	A A PEREZ	Review AIG's proposed jury instructions (.7); analyze whether US Sugar can use demonstratives not included on exhibit list (2.0); revise US Sugar's objections to AIG's exhibit list (.8); revise and finalize US Sugar's jury instructions and circulate the same to opposing counsel (2.1).	5.60
05/05/2023	C D STEKLOF	Review analysis and issues related to insurer's motion to strike trial witnesses (.5); exchange various correspondence regarding use of demonstratives at trial (.5); review various correspondence received from insurer regarding Dentons conflict (.5); coordinate drafting and revisions related to objections to AIG's exhibit list and U.S. Sugar's proposed jury instructions and communicate regarding same (4.1); review and analyze proposed jury instructions from AIG and communicate regarding same (1.5); exchange various correspondence to coordinate pretrial witness prep sessions and materials for review by witnesses (1.0); review draft summary judgment motion (1.0); communicate regarding issues related to Akerman's withdraw motion (.5).	9.60

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

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DATE: 06/30/2023
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/06/2023	W ANDREWS	Review and supplement draft summary judgment motion; review additional case law research regarding same; review AIG proposed jury instructions and case law regarding same; review and supplement draft brief in opposition to Akerman motion to withdraw due to Denton's conflict;	6.00
05/06/2023	A DEFIELD	Revise motion for summary judgment.	1.90
05/06/2023	K L FAGLIONI	Preparation of draft response to Akerman's motion for leave to withdraw; correspondence regarding same.	1.00
05/06/2023	A A PEREZ	Analyze Scott Hawkins email regarding duplicate work on invoices (.5); analyze whether a pretrial conference should be requested (.3); combine AIG and US Sugar's proposed jury instructions and analyze how to proceed with differences (3.10).	3.90
05/06/2023	C D STEKLOF	Exchange various correspondence regarding various pleadings for filing and forthcoming Motion for Summary Judgment (.7); revise response to Akerman's motion to withdraw (1.8); revise draft Motion for Summary Judgment and draft supporting affidavit from Mr. Kurtz (3.0).	5.50
05/07/2023	W ANDREWS	Substantial work on summary judgment motion, motion for leave to file summary judgment, statement of facts, Luke Kurtz affidavit, and motion to oppose Akerman withdrawal due to Denton conflict.	3.50
05/07/2023	A DEFIELD	Review and analyze revisions and revise motion for summary judgment accordingly; research for motion for extension; review and analyze research; draft motion for extension; revise motion for extension in light of Mr. Andrews' comments.	4.90
05/07/2023	C D STEKLOF	Revise motion for summary judgment and draft supporting Kurtz affidavit (2.7); revise response regarding Akerman's motion to withdraw (.5).	3.20
05/08/2023	W ANDREWS	Review of new drafts of summary judgment papers; work on opposition to motion to strike; [REDACTED] review jury instruction filings by AIG and US Sugar; review and supplement new draft of opposition to withdrawal of Akerman; begin outlining witness testimony for trial.	9.00
05/08/2023	V CHAPUNOFF	Separate firm and third-party vendor fees and expenses by entity and analyze next steps in connection with same, for use in motion for summary judgment, and prepare exhibits to affidavit of Luke Kurtz in support of motion for summary judgment.	1.50

HUNTON ANDREWS KURTH LLP
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HUNTON ANDREWS KURTH LLP
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/08/2023	A A PEREZ	Analyze how to proceed with deduction of co-op payments (2.0); analyze Luke Kurtz affidavit (.3); analyze draft motion for summary judgment (.6); analyze draft motion for extension of dispositive motion deadline (.4); revise motion for summary judgment regarding Defense Expenses to add chart regarding fees (.8); revise joint jury instructions in preparation for filing (2.10); revise draft motion for summary judgment regarding Defense Expenses (1.2); draft joint motion requesting pretrial conference (.6); develop strategy for how to revise motion for summary judgment on defense expenses (.4); develop strategy for pretrial conference in light of Court's statements (.6); call Judge Scola's chambers regarding pretrial conference and calendar call (.3); develop strategy for how to proceed with jury instructions in light of meet and confer (.5); participate in meet and confer with opposing counsel re: jury instructions (.5); prepare for meet and confer with opposing counsel re: jury instructions (.5).	10.80
05/08/2023	C D STEKLOF	Draft and revise motion for summary judgment, notice of filing summary judgment evidence, statement of material facts, and supporting affidavit from Mr. Kurtz and communicate regarding various issues related to same (9.5); address various issues related to monetary damages to be sought at trial (1.0).	10.50
05/09/2023	W ANDREWS	Final review and supplementation of draft motion for summary judgment, motion for leave to file and statement of undisputed facts; [REDACTED] [REDACTED] work on trial and witness strategy.	5.00
05/09/2023	V CHAPUNOFF	Identify and prepare invoice-related information for use in motion for summary judgment.	0.40
05/09/2023	A DEFIELD	[REDACTED] [REDACTED] [REDACTED]	10.50
05/09/2023	J L HUCKABA	Analyze correspondence from underlying defense counsel on the roles of law firms and third-party vendors in connection with drafting summary judgment motion on defense expenses.	0.30
05/09/2023	J L HUCKABA	[REDACTED] [REDACTED]	1.40

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/09/2023	J L HUCKABA	[REDACTED]	1.00
05/09/2023	J L HUCKABA	[REDACTED]	2.10
05/09/2023	J L HUCKABA	[REDACTED]	1.20
05/09/2023	J L HUCKABA	[REDACTED]	1.00
05/09/2023	J L HUCKABA	[REDACTED]	1.30
05/09/2023	A A PEREZ	Continue drafting direct examination outline for Robert Buker (3.10); communicate with Greg Schwinghammer regarding availability for trial (.3); email opposing counsel regarding joint motion requesting pretrial conference (.3); prepare for and participate in teleconference with Scott Hawkins regarding exhibits for trial (.6); [REDACTED] [REDACTED] .3); finalize motion for extension of dispositive motion deadline (1.3); draft joint motion requesting pretrial conference (.6); develop strategy for witness preparation in light of upcoming tasks (.5); revise chart in motion for summary judgment regarding Defense Costs requested (1.8).	8.80
05/09/2023	C D STEKLOF	Draft, revise, and finalize motion for extension to file summary judgment motion, notice of filing summary judgment evidence, Kurtz affidavit, statement of material facts, and proposed Motion for Summary Judgment and coordinate filing of same	7.40
05/10/2023	W ANDREWS	Work on trial witness strategy; work on summary judgment strategy; work on expert witness document issues and review subsequent production by Mr. Ranis regarding same; review Ranis deposition transcript to prepare for trial; [REDACTED]	7.50
05/10/2023	A DEFIELD	[REDACTED]	10.50

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/10/2023	J L HUCKABA	[REDACTED]	1.30
05/10/2023	J L HUCKABA	[REDACTED]	1.20
05/10/2023	J L HUCKABA	Evaluate strategy for next steps, including coordinating on filing deadlines for reply to response in opposition to motion for extension in light of court's expedited briefing order.	0.30
05/10/2023	J L HUCKABA	[REDACTED]	0.70
05/10/2023	J L HUCKABA	Draft background and introduction section of Schwinghammer Direct Witness Outline.	0.50
05/10/2023	J L HUCKABA	Evaluate strategy for drafting revisions to response in opposition to insurer's motion to strike witnesses disclosed post-discovery.	0.70
05/10/2023	A A PEREZ	Finalize joint motion requesting pretrial conference (.2); communicate with Scott Hawkins regarding prior direct examinations (.4); communicate with Scott Hawkins regarding prior direct examinations (5.2); analyze Scott Hawkins' expert report in order to draft direct examination outline (1.5); finalize direct examination outline for Robert Bunker (3.10).	10.40
05/10/2023	K M RUDD	Research and locate any and all documents filed by Paul Ranis in Lakeside Villas at Bonaventure vs. Rachael Larrier, et al., Case No. 13-021843, In the Circuit Court of the 17th Judicial Circuit, Broward County, FL and Chateau 2 Condominium Association vs. Melva Chennault, et al., Case No. 04-18404 (09), In the Circuit Court of the 17th Judicial Circuit, Broward County, FL	0.20
05/10/2023	C D STEKLOF	Analyze and outline response to AIG's motion to strike trial witnesses (1.5); communicate with client regarding various issues related to trial preparation and trial and address same with Mr. Andrews (1.3); communicate regarding response to motion to strike trial witnesses (.5); address various issues related to witness outlines and tasks in preparation for trial (1.0); analyze materials produced by Mr. Ranis based on expert deposition and exchange correspondence regarding same (.6); review and revise response to AIG's motion to strike trial witnesses (6.6).	11.50
05/10/2023	S A WEEKS	Research all documents filed by Ranis in the three actions disclosed in deposition and subsequent May 10 email.	0.70

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/10/2023	S A WEEKS	Review materials from Ranis deposition and letter requesting documents; research rule for compelling documents.	2.00
05/11/2023	W ANDREWS	[REDACTED]	1.50
05/11/2023	V CHAPUNOFF	Identify information in connection with invoices and CoOp payments for attorney use in witness and briefing preparation.	0.20
05/11/2023	A DEFIELD	Develop strategy with team regarding motions practice and next steps (.9); communicate with Mr. Steklof re: requested relief in motion and next steps (.5); review additional case law (1).	2.40
05/11/2023	J L HUCKABA	Draft revisions to response in opposition of insurer's motion to strike.	0.60
05/11/2023	J L HUCKABA	Evaluate strategy for next steps, including filing response to motion to strike and preparing witness trial outlines.	0.20
05/11/2023	J L HUCKABA	Analyze insurer's expert deposition transcript in connection with drafting direct witnesses outline for witness Greg Schwinghammer.	1.10
05/11/2023	J L HUCKABA	Draft hours expended and reasonable rate section of direct witness outline for witness Greg Schwinghammer.	1.30
05/11/2023	J L HUCKABA	Draft underlying lawsuit and complexity of the case sections of direct witness outline for witness Greg Schwinghammer.	2.00
05/11/2023	J L HUCKABA	Draft attorney-client relationship and outcome of the underlying lawsuit sections of direct witness outline for witness Greg Schwinghammer.	1.00
05/11/2023	J L HUCKABA	Draft number of attorneys and coordination with other law firms sections of direct witness outline for witness Greg Schwinghammer.	1.00
05/11/2023	J L HUCKABA	Research precedent on the sufficiency of bad faith claims, including cases denying motions to dismiss bad faith claims.	0.90
05/11/2023	A A PEREZ	Analyze and provide comments to initial outline for Greg Schwinghammer's direct examination (.5); analyze how to profer expert witness (.6); develop strategy for what to include in Luke Kurtz' direct examination outline (.8); analyze C. Stekloff's notes from Scott Hawkins' deposition and incorporate the same into direct examination outline (.9); continue drafting Scott Hawkins direct examination outline (7.2); analyze Scott Hawkins prior trial testimony regarding fees (.6).	10.60

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/11/2023	C D STEKLOF	Review proposed revisions to response to motion to strike (.5); address various issues related to trial prep and trial logistics (1.0); draft correspondence to client regarding various motions pending before court, trial logistics, and related matters (1.0); communicate regarding issues related to witness outlines and preparation (.5); review and revise draft reply in support of motion for leave to amend complaint (2.7).	5.70
05/12/2023	W ANDREWS	[REDACTED]	1.20
05/12/2023	W ANDREWS	Review and supplement draft Hawkins direct examination outline in preparation for meeting with him regarding his trial testimony; review AIG opposition to motion for leave to file summary judgment motion on damages and online reply to same; review and supplement draft examination outline for Mr. Bunker; review and supplement brief in opposition to motion to strike.	5.00
05/12/2023	V CHAPUNOFF	Identify and prepare documents for use at pretrial conference, including index to same.	1.00
05/12/2023	V CHAPUNOFF	Identify information in connection with invoices to assist counsel in preparing witness outlines.	0.30
05/12/2023	A DEFIELD	[REDACTED] (.8); [REDACTED] (1); [REDACTED] (.7); review task list (.1); review recent filings (.2)	2.80
05/12/2023	J L HUCKABA	[REDACTED]	1.00
05/12/2023	J L HUCKABA	Evaluate strategy for dividing amounts of defense costs by vendor and firm to determine amounts attributable in connection with drafting witness outlines.	0.20
05/12/2023	J L HUCKABA	Evaluate strategy for expanding on attorney rates and hours expended in witness outlines in connection with trial preparation.	0.20
05/12/2023	J L HUCKABA	Draft revisions to direct witness outline for witness Greg Schwinghammer.	2.00
05/12/2023	J L HUCKABA	Analyze invoices to determine the total amount of fees and costs incurred for the law firms involved in the defense of the underlying lawsuit.	1.00

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05/12/2023	J L HUCKABA	Draft total fees incurred section of direct witness outline for witness Greg Schwinghammer.	0.90
05/12/2023	J L HUCKABA	Analyze invoices to determine rates charged for attorneys, electronic discovery manager, investigator, and paralegals.	2.00
05/12/2023	J L HUCKABA	Draft revisions relating to rates charged and hours reasonably expended for all firm attorneys and other professionals to direct witness outline for witness Greg Schwinghammer.	1.40
05/12/2023	A A PEREZ	Draft outline of direct examination of Luke Kurtz (6.4); analyze AIG's opposition to U.S. Sugar's Motion for Extension (.3); analyze contracts provided by Gravity Stack for trial support services (.6); revise U.S. Sugar's opposition to AIG's motion to strike in order to file the same (.9); develop strategy for trial preparation in light of recent developments (.7); analyze whether to add additional Ranis affidavits to exhibit list (.6); draft notice of filing objections to AIG's exhibit list (.8).	10.30
05/12/2023	C D STEKLOF	Communicate regarding notice of filing to address objections to AIG trial exhibits (.4); communicate with Mr. Andrews regarding upcoming filings and next steps (.3); address various issues related to litigation tasks and trial preparation (1.0); revise and finalize opposition to AIG's motion to strike trial witnesses [REDACTED] (6.4).	8.10
05/13/2023	W ANDREWS	Review arguments in support of motion for leave to file summary judgment motion.	1.00
05/13/2023	A A PEREZ	Continue drafting direct examination outline for Luke Kurtz.	4.30
05/13/2023	C D STEKLOF	Analyze and outline response to AIG's opposition to motion for leave to file motion for summary judgment (1.5); draft reply in support of motion for leave to file summary judgment motion (5.6); draft correspondence regarding potential settlement discussions prior to trial (.6).	7.70
05/14/2023	W ANDREWS	Review draft Bunker trial witness outline; review and supplement draft reply brief in support of motion for leave to file summary judgment motion.	1.50
05/14/2023	C D STEKLOF	Draft and revise reply in support of motion for extension to file proposed Motion for Summary Judgment	5.70

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/15/2023	W ANDREWS	Meet with Mr. Hawkins to prepare for his trial testimony, and review his deposition transcript re same; additional review of draft reply brief in support of motion for leave to file summary judgment motion; prepare for pretrial conference; review court order on motion for leave to file summary judgment motion and consider strategy and outline arguments regarding same.	6.00
05/15/2023	V CHAPUNOFF	Identify and prepare documents for use at pretrial conference, including index to same.	1.60
05/15/2023	V CHAPUNOFF	Analyze docket entries 106-113 related to unopposed motion showing good cause to excuse Walter J. Andrews from pretrial conference, objections to Defendant's exhibit list, Akerman LLP's amended motion for leave to withdraw, Plaintiff's motion for leave to amend complaint, Defendant's motion to strike post-discovery disclosure of witnesses, and Plaintiff's expedited motion for extension of dispositive motion deadline and request for expedited briefing, supplement court pleadings index to reflect same, and analyze information sent to client regarding order affecting deadlines.	0.50
05/15/2023	A DEFIELD	Review opposition to motion for extension and outline points to drive home in reply (.8); review, revise, and supplement draft reply (2); review new orders (.3); confer with team on strategy moving forward (1).	4.10
05/15/2023	J L HUCKABA	Research precedent on policy interpretation under Florida law in connection with reply in support of motion for extension of time to file summary judgment motion.	0.50
05/15/2023	J L HUCKABA	Research precedent on the "law of the case" doctrine in connection with reply in support of motion to extend time to file summary judgment motion.	0.30
05/15/2023	J L HUCKABA	Draft revisions and address comments to reply in support of motion for extension of time to file summary judgment motion.	0.80
05/15/2023	J L HUCKABA	Draft introduction and biographical information section of direct witness outline for witness Tim Bishop.	0.30
05/15/2023	J L HUCKABA	Evaluate strategy for trial preparation following court's order granting motion for extension of time to file summary judgment motion.	0.20

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/15/2023	A A PEREZ	Analyze which law firms and vendors should be further investigated for reply in support of motion for summary judgment (.5); analyze order on motion to withdraw. (.2); develop strategy for how to proceed in case in light of recent order on motion for extension (1.5); analyze Court's order on motion for extension. (.3); continue drafting direct examination outline for Luke Kurtz (3.6)	6.10
05/15/2023	C D STEKLOF	Review direct examination outline for Mr. Hawkins and meet with expert witness to prepare for trial testimony (4.5); review court orders postponing trial and granting leave to file summary judgment motion (.5); draft various correspondence to witnesses regarding postponement and future planning for trial (.5); communicate with client regarding orders (.5); analyze various issues for research in connection with breach of duty to defend and recoverable damages and communicate with team to coordinate research efforts and continued preparation for trial (2.5).	8.50
05/16/2023	V CHAPUNOFF	Analyze docket entries 114-116 related to U.S. Sugar's motion for summary judgment, and supplement court pleadings index to reflect same.	0.10
05/16/2023	A DEFIELD	Conference with Mr. Steklof on next steps (.5); conference with Mr. Steklof and Ms. Perez on dispositive motion strategy and research tasks for reply in support of motion for summary judgment (.5); pull key cases together for Ms. Perez's research and her drafting of caselaw chart (.5).	1.50
05/16/2023	A A PEREZ	Develop strategy for reply in support of motion for summary judgment.	0.60
05/16/2023	C D STEKLOF	Analyze various issues related to next steps with litigation in light of Court's order postponing trial (1.0); analyze necessary research into Florida case law on recoverable damages in connection with forthcoming reply in support of summary judgment (1.5); communicate with team and exchange various correspondence to coordinate upcoming litigation tasks and prepare for reply in support of summary judgment (2.4).	4.90
05/17/2023	W ANDREWS	Review strategy regarding AIG obligation to pay coverage fees and review correspondence regarding same; review new bad faith research.	1.00
05/17/2023	A DEFIELD	[REDACTED] (1.5); [REDACTED] (.5); confer with Ms. Perez on chart on duty to defend damages cases for MSJ Reply/trial (.2).	2.20

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05/17/2023	J L HUCKABA	Conference with client and underlying counsel regarding role of vendors and each law firm in the underlying litigation in connection with drafting reply in support of motion for summary judgment on defense expenses.	1.80
05/17/2023	A A PEREZ	Closely analyze cases awarding fees after insurer breached duty to defend in order to assist with drafting of reply in support of motion for summary judgment (5.8); analyze how newly revealed information regarding vendors impacts strategy of case (.6); participate in teleconference with U.S. Sugar regarding roles of vendors and law firms in underlying case in preparation for reply in support of motion for summary judgment (1.9).	8.30
05/17/2023	C D STEKLOF	Draft and revise correspondence to insurer regarding reimbursement of coverage litigation fees and costs and related issues in connection with payment of invoices (2.0); communicate with client and Mr. Schwinghammer regarding underlying vendor involvement and fees and draft notes in connection with same (1.8); review prior research regarding policyholder's ability to control defense after coverage denial and exchange correspondence regarding same (1.0); address various issues related to upcoming litigation tasks and next steps (.9).	5.70
05/18/2023	W ANDREWS	[REDACTED]	0.80
05/18/2023	A DEFIELD	[REDACTED]	2.80
05/18/2023	J L HUCKABA	[REDACTED]	0.20
05/18/2023	J L HUCKABA	Draft summary of meeting with client and underlying counsel regarding the roles of each firm and vendor to assist in drafting reply in support of motion for summary judgment.	0.40
05/18/2023	A A PEREZ	Continue to closely analyze cases awarding fees after insurer breached duty to defend in order to assist with drafting of reply in support of motion for summary judgment (3.0); [REDACTED] (.3).	3.30

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/18/2023	C D STEKLOF	(1.0); address various issues related to fees incurred by U.S. Sugar to coordinate second reimbursement from AIG (2.0); draft/revise correspondence to AIG demanding reimbursement of second tranche of fees and costs and draft correspondence to client regarding same (2.0); address various issues related to litigation strategy and ongoing research (1.3).	6.30
05/19/2023	W ANDREWS	Review legal research and rules regarding offer of judgment from AIG.	0.50
05/19/2023	A A PEREZ	Continue to closely analyze cases awarding fees after insurer breached duty to defend in order to assist with drafting of reply in support of motion for summary judgment.	1.50
05/19/2023	C D STEKLOF	Draft correspondence to client regarding update on recent court orders (.7); analyze various issues related to fees billed by Dentons and coordinate research into same (.5); address various issues related to trial preparation and next steps (1.5); review and annotate deposition transcript of Scott Hawkins (3.1); review proposal for settlement and draft correspondence regarding same (.7).	6.50
05/20/2023	C D STEKLOF	Exchange various correspondence regarding AIG's proposal for settlement	0.20
05/21/2023	J L HUCKABA	Analyze correspondence on the deficiencies of insurer's proposal for settlement, including the applicability of the offer of judgment statute.	0.20
05/21/2023	C D STEKLOF	Review various correspondence related to expert fees and costs and draft correspondence regarding proposal for settlement	0.60
05/22/2023	W ANDREWS	Review and determine appropriate response to AIG offer to settle; review AIG reply brief in support of motion to strike witnesses.	1.00
05/22/2023	A DEFIELD	Review PFS research and confer with team on same.	0.80
05/22/2023	A A PEREZ	Analyze proposal for settlement and develop strategy for how to proceed with case in light of the same (1.5); continue to closely analyze cases awarding fees after insurer breached duty to defend in order to assist with drafting of reply in support of motion for summary judgment (4.7).	6.20

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/22/2023	C D STEKLOF	Analyze various issues related to proposal for settlement, prior research into same, and draft correspondence to team regarding additional research (2.2); communicate regarding offer and next steps (.6); review and annotate deposition testimony from Mr. Hawkins and exchange various correspondence regarding same (3.2); address various issues related to trial preparation and upcoming reply in support of summary judgment motion (1.5).	7.50
05/23/2023	W ANDREWS	Review expert and offer of judgment issues and strategy.	0.50
05/23/2023	J L HUCKABA	Analyze summary of research on proposals for settlement, including their enforceability and inclusivity of pre-judgment interest (.30); clarify discrepancies in expert witness's testimony on fees charged by rebuttal expert's firm in other cases (.20); draft summary of next steps for trial preparation; evaluate strategy for preparing expert witness direct outlines and cross outlines for fact witnesses (.70).	1.40
05/23/2023	A A PEREZ	Research cases discussing when an award of all defense costs is appropriate in order to draft reply in support of US Sugar's motion for summary judgment (4.8); analyze cases discussing Coblenz agreements in order to draft reply in support of US Sugar's motion for summary judgment (1.0); confer with Scott Hawkins regarding exhibits for his direct examination (.6); analyze how to proceed with witness outlines in light of new trial date (.6).	7.00
05/23/2023	K M RUDD	Research fee applications filed by Dentons US LLP which include the rates requested by Keith Moskowitz and Timothy Storino.	1.00
05/23/2023	K M RUDD	Research fee applications filed by Dentons US LLP in the Southern District of Florida	0.80
05/23/2023	C D STEKLOF	Draft analysis to client regarding proposal for settlement served by AIG and potential implications (1.5); analyze various issues related to calculation of pre-judgment interest in order to evaluate proposal for settlement (1.0); communicate and analyze various issues related to witness preparation surrounding new trial date (1.2); communicate with team regarding current litigation tasks and witness outlines for trial preparation (1.0); draft various correspondence to witnesses regarding scheduling related to witness preparation for new trial date (1.0); address various issues related to research for trial and reply in support of summary judgment motion (1.4).	7.10

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DATE	TIMEKEEPER	DESCRIPTION	HOURS
05/24/2023	V CHAPUNOFF	Analyze information sent to and from witnesses in relation to selecting dates for trial preparation, and create witness tracking chart.	0.90
05/24/2023	J L HUCKABA	Research precedent on whether a party is required to call its will-call witnesses at trial.	1.60
05/24/2023	A A PEREZ	Analyze research on offers of judgment (.6); continue drafting direct examination outline of Luke Kurtz (2.4).	3.00
05/24/2023	K M RUDD	Research the policy language used regarding defense cost and expenses in various reasonable fees cases	1.60
05/24/2023	C D STEKLOF	Address various issues related to trial preparation (1.0); analyze prior fee applications filed by Dentons in S.D. Florida and draft correspondence to team regarding same (1.1).	2.10
05/25/2023	W ANDREWS	Review trial witness strategy; review potential additional support for Scott Hawkins expert testimony; telephone call with Mr. Kurtz regarding case strategy and follow up regarding same.	1.50
05/25/2023	V CHAPUNOFF	Follow up with expert S. Hawkins on his errata sheet, and correspond with Mr. Hawkins in connection with same.	0.30
05/25/2023	V CHAPUNOFF	Prepare additional trial exhibit for input into databases.	0.20
05/25/2023	J L HUCKABA	Evaluate strategy for maintaining charts and demonstratives for trial, including updating exhibit list (1.5); draft summary of next steps and deadlines for submissions to the court (.10).	1.60
05/25/2023	A A PEREZ	Analyze research on offer of judgment rule in Florida in order to develop strategy for response to AIG's proposal for settlement (1.3); analyze how best to prepare exhibits for trial (1.8)	3.10
05/25/2023	K M RUDD	Research the policy language used regarding defense cost and expenses in various reasonable fees cases	1.70
05/25/2023	C D STEKLOF	Draft analysis for client regarding budget projection and timeline for recovery (1.5); team meeting regarding various documents and related materials compiled for trial (1.5); communicate and exchange various correspondence regarding litigation tasks (1.7).	4.70
05/26/2023	W ANDREWS	Review trial and witness strategy.	0.30
05/26/2023	V CHAPUNOFF	Analyze task list and next steps in connection with same.	0.10

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05/26/2023	V CHAPUNOFF	Analyze errata sheet received from S. Hawkins and attorney corrections of said sheet, draft corrected errata sheet, correspond with S. Hawkins and his assistant in connection with same, and supplement deponent tracking log to reflect updates.	1.30
05/26/2023	A DEFIELD	Analyze case chart for motion for summary judgment briefing and provide instruction on further updates to same and further research needed.	1.50
05/26/2023	A A PEREZ	Continue analyzing cases discussing how fees are awarded when an insurer breaches its duty to defend in order to draft reply in support of summary judgment (1.8); analyze Paul Ranis' prior affidavits in order to determine if exhibit list should be amended (.5).	2.30
05/26/2023	K M RUDD	Research Dentons US LLP fee applications filed in federal court, nationwide, from 2019 through the present.	1.50
05/26/2023	C D STEKLOF	Address issues related to finalizing errata sheet for Mr. Hawkins (.4); address various litigation tasks related to trial preparation and forthcoming reply in support of summary judgment motion (1.0).	1.40
05/30/2023	W ANDREWS	Work on trial preparation strategy.	0.50
05/30/2023	V CHAPUNOFF	Download and prepare P. Ranis video deposition files for input into database, revise draft S. Hawkins errata sheet, and supplement deponent tracking log to reflect updates.	0.70
05/30/2023	A DEFIELD	Discuss leave to file under seal issues with team and reply brief strategy.	0.50
05/30/2023	J L HUCKABA	Analyze confidentiality agreement and standing orders to determine conferral requirements for filing a motion to file exhibits under seal.	0.30
05/30/2023	A A PEREZ	Revise chart detailing cases that are potentially helpful for reply in support of motion for summary judgment.	8.40
05/30/2023	C D STEKLOF	Draft and exchange various correspondence regarding issues related to new trial schedule (.7); coordinate final errata sheet from expert (.4); exchange various correspondence with opposing counsel regarding effort to file invoices under seal and review local rules regarding same (.8); address various issues in anticipation of AIG's opposition to summary judgment motion (1.4).	3.30
05/31/2023	W ANDREWS	Review AIG brief in opposition to US Sugar motion for summary judgment; outline reply arguments to make in support of summary judgment motion on duty to defend.	2.00

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05/31/2023	A DEFIELD	Review opposition MSJ brief and outline key points for reply; review case chart by Ms. Perez for flagging key cases for reply; confer with team on reply; review correspondence regarding conferral with opposing counsel on their desire to file their own second MSJ and regarding trial scheduling; review Mr. Steklof's outline for reply brief and comment on same.	3.30
05/31/2023	J L HUCKABA	Draft updates to witness tracker chart (.10); analyze insurer's response in opposition to motion for summary judgment in connection with determining strategy for reply (.50); summarize research on across-the-board fee reductions in connection with reply in support of motion for summary judgment (.10).	0.70
05/31/2023	A A PEREZ	Review opposition to motion for summary judgment filed by AIG (1.5); analyze how to respond to AIG's opposition to US Sugar's summary judgment filing (2.0); analyze cases cited in AIG's opposition to US Sugar's summary judgment filing (1.3); research cases discussing whether affirmative defenses not asserted in answer are waived in order to assist in drafting of reply in support of US Sugar's summary judgment motion (2.3).	7.10
05/31/2023	C D STEKLOF	Analyze AIG's opposition to U.S. Sugar's summary judgment motion and response to statement of material facts and annotate same (3.0); analyze precedent on ability to recover all damages for breach of duty to defend (3.5); meet and confer with opposing counsel regarding trial scheduling and draft correspondence to team regarding same (.4); communicate with team regarding reply in support of summary judgment motion (.9); outline reply in support of summary judgment motion and review exhibits to support same (2.1).	9.90
TOTAL HOURS			602.10

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	79.60	1,247.00	99,261.20
A DEFIELD	Partner	77.80	932.00	72,509.60
K L FAGLIONI	Partner	4.50	1,080.00	4,860.00
C D STEKLOF	Counsel	170.30	869.00	147,990.70
J L HUCKABA	Associate	78.50	536.00	42,076.00
A A PEREZ	Associate	156.50	779.00	121,913.50
S A WEEKS	Associate	2.70	729.00	1,968.30
V CHAPUNOFF	Paralegal	21.40	333.00	7,126.20
K M RUDD	Librarian	10.80	378.00	4,082.40
TOTAL FEES (\$)				501,787.90

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114033020
DATE: 06/30/2023
PAGE: 24

INVOICE SUMMARY:

Current Fees:	\$ 501,787.90
Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 501,787.90



HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114033215
DATE: 07/28/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending June 30, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 241,238.60
Current Charges:	584.12
CURRENT INVOICE AMOUNT DUE:	\$ 241,822.72

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114033020	0000016	06/30/2023	501,787.90

Outstanding Balance (for matter(s) on this invoice): 501,787.90

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 743,610.62

TO RECEIVE PROPER CREDIT, PLEASE ATTACH REMITTANCE COPY WITH PAYMENT.

FOR BILLING INQUIRIES, PLEASE CALL: 804-788-8555

To Pay By Mail:
HUNTON ANDREWS KURTH LLP
PO BOX 405759
ATLANTA, GA 30384-5759

To Pay by Wire Transfer or ACH:
Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: 001458094
ABA Transit: 061000104
Swift Code (International): SNTRUS3A
Information with Wire: File: 054740.0000016, Inv: 114033215, Date: 07/28/2023



HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

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EIN 54-0572269

INVOICE SUMMARY-REMITTANCE PAGE

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114033215
DATE: 07/28/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending June 30, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

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INVOICE	MATTER #	DATE	BALANCE
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Outstanding Balance (for matter(s) on this invoice): 501,787.90

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 743,610.62

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ATLANTA, GA 30384-5759

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Bank: Truist Bank, Richmond, VA
Account Name: Hunton Andrews Kurth LLP Operating
Account Number: 001458094
ABA Transit: 061000104
Swift Code (International): SNTRUS3A
Information with Wire: File: 054740.0000016, Inv: 114033215, Date: 07/28/2023

HUNTON ANDREWS KURTH

HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE DETAIL

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114033215
DATE: 07/28/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH JUNE 30, 2023:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
06/01/2023	W ANDREWS	Review and supplement draft outline of reply brief in support of summary judgment motion; review trial strategy.	1.50
06/01/2023	A A PEREZ	Research cases discussing implied consent to affirmative defenses not pleaded in answer (3.0); analyze cases from the 11th Circuit that held that not pleading an affirmative defense did not constitute waiver (1.5); analyze schedules of witnesses in preparation for trial (1.2); analyze demonstrative provided by Scott Hawkins in preparation for trial (.8).	6.50
06/01/2023	C D STEKLOF	Communicate regarding reply in support of motion for summary judgment and potential request to continue trial (.8); draft reply in support of motion for summary judgment (8.5).	9.30
06/02/2023	W ANDREWS	Review AIG motion for leave to file a later summary judgment motion and the draft of the summary judgment motion and consider strategy for opposing same; review trial witness preparation strategy.	2.50
06/02/2023	A DEFIELD	Review AIG's newly filed motion for summary judgment and motion for leave and develop strategy on same; pull prior research and caselaw for inclusion in motion; revise and supplement outline for motion response and develop strategy on approach to this response and to reply in support of motion for summary judgment; outline on strategy and next steps moving forward; review caselaw for Mr. Steklof's brief.	4.30

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114033215
DATE: 07/28/2023
PAGE: 2

DATE	TIMEKEEPER	DESCRIPTION	HOURS
06/02/2023	J L HUCKABA	Review insurer's motion for leave to file a cross motion for summary judgment (.20); review insurer's proposed cross motion for summary judgment to determine research for opposition (.50); evaluate strategy for drafting opposition to insurer's motion for leave, including research needed (.50); analyze local rules for the southern district on successive motions for summary judgment (.20); research precedent on the prohibition against successive motions for summary judgment (1.40); research precedent on successive summary judgment motions circumventing the local rule on page limitations for motions (.70); research precedent on full opportunity to be heard in response to opposition (.50); analyze precedent on insurer being liable for all damages flowing from breach in connection with preparing response in opposition to motion for leave to file cross-motion for summary judgment (.50).	4.40
06/02/2023	J L HUCKABA	Draft revisions to reply in support of motion for summary judgment, including distinguishing cases where the policy imposed a reasonableness requirement.	0.80
06/02/2023	A A PEREZ	Analyze AIG's motion for extension of time and proposed cross-motion for summary judgment (1.5); draft outline for opposition to motion for extension of time (.5); draft opposition to motion for extension of time (8.1); draft string cites for footnotes in reply in support of summary judgment (.7).	10.80
06/02/2023	C D STEKLOF	Draft reply in support of U.S. Sugar's motion for summary judgment	7.90
06/03/2023	A DEFIELD	Review, revise, and supplement opposition to AIG's Motion for Leave.	3.00
06/03/2023	A A PEREZ	Revise draft opposition to AIG's Motion for Extension (3.2); analyze what needs to be done to finalize reply in support of motion for summary judgment (.5).	3.70
06/03/2023	C D STEKLOF	Draft and revise reply in support of motion for summary judgment and response to statement of additional facts asserted by AIG	7.00
06/04/2023	J L HUCKABA	Draft revisions to reply in support of motion for summary judgment to highlight the distinctions in cases where across-the-board fee reductions are appropriate (.50); draft underlying lawsuit, complexity of the case, number of attorneys, and attorney-client relationship sections of direct witness outline for Tim Bishop (1.9); draft coordination with other law firms section of direct witness outline for Tim Bishop (.30).	2.70
06/04/2023	C D STEKLOF	Exchange various correspondence regarding reply in support of summary judgment motion	0.40

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114033215
DATE: 07/28/2023
PAGE: 3

DATE	TIMEKEEPER	DESCRIPTION	HOURS
06/05/2023	W ANDREWS	Review and supplement draft brief in opposition to AIG motion for leave to file second summary judgment motion; review and supplement draft reply brief in support of US Sugar summary judgment motion; telephone call with Luke Kurtz regarding trial strategy and follow up regarding same.	3.50
06/05/2023	R G BOCZKAJ-GONZALEZ	Analyze Court's and Judge Scola's local rules and procedures as to trial exhibits.	1.50
06/05/2023	R G BOCZKAJ-GONZALEZ	Finalize for filing U.S. Sugar's Opposition to AIG's Motion for Leave to File a Cross-Motion for Summary Judgment.	0.20
06/05/2023	A DEFIELD	Work on finalizing opposition brief to motion for extension to allow AIG to file a MSJ (2.5); revise and supplement draft reply brief (2.5); review cases cited in same (1.5); and develop strategy on same (.5).	7.00
06/05/2023	J L HUCKABA	Draft notice of filing summary judgment evidence for expert report and rebuttal expert report (.70); draft summary of updates and next steps in briefing schedule and trial preparation (.10); review comments to reply in support of motion for summary judgment to determine additional research and revisions (.20).	1.00
06/05/2023	A A PEREZ	Analyze and revise draft reply in support of summary judgment in order to finalize (4.0); revise opposition to motion for extension (1.8); analyze draft notice of summary judgment evidence (.3); develop schedule for witness prep sessions (.5); continue to draft Luke Kurtz's direct examination outline (2.5)	9.10
06/05/2023	C D STEKLOF	Exchange various correspondence in connection with revisions to reply in support of summary judgment	0.20
06/06/2023	W ANDREWS	Review court order on AIG request for leave to file summary judgment motion and to move trial dates and consider next steps regarding same.	1.00
06/06/2023	R G BOCZKAJ-GONZALEZ	Review, bluebook and citecheck the current draft of U.S. Sugar's Reply in Support of Motion for Summary Judgment.	3.00
06/06/2023	A DEFIELD	Work on finalizing reply brief in support of MSJ; revise and supplement.	1.90

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114033215
DATE: 07/28/2023
PAGE: 4

DATE	TIMEKEEPER	DESCRIPTION	HOURS
06/06/2023	J L HUCKABA	Research precedent stating an insurer cannot benefit from its own breach (.50); Analyze expert reports to determine any confidential information to redact prior to filing summary judgment evidence (.20); finalize notice of filing summary judgment evidence in connection with reply in support of motion for summary judgment (.20); prepare exhibits for notice of filing summary judgment evidence (.30); draft revisions to reply in support of motion for summary judgment (.50).	1.70
06/06/2023	A A PEREZ	Revise U.S. Sugar's reply in support of motion for summary judgment to finalize and file the same (3.7); review notice of filing summary judgment evidence in order to file the same (.5); review U.S. Sugar's statement of material facts for reply in support of motion for summary judgment (.3).	4.50
06/06/2023	C D STEKLOF	Address various issues related to reimbursement of defense costs and letter to AIG regarding same	1.00
06/07/2023	A DEFIELD	Review and analyze reply motion from AIG and develop strategy on same; develop strategy on court's order and next steps; communicate with client regarding order and case being reset.	1.50
06/07/2023	J L HUCKABA	Analyze insurer's reply in support of its motion for leave to file cross motion for summary judgment (.30).	0.30
06/07/2023	A A PEREZ	Schedule sessions to prepare witnesses for trial (2.2); Analyze AIG's motion for summary judgment in order to assist in drafting the same (2.8); Analyze why there is a discrepancy in latest invoice from Jones Foster (.5); participate in teleconference with Scott Hawkins regarding demonstratives and unpaid invoices (.8); analyze whether notice of unavailability should be filed given conflicts (.4)	6.70
06/08/2023	A DEFIELD	Outline next steps; confer with client on scheduling; outline research needed for response brief.	1.20
06/08/2023	J L HUCKABA	Evaluate strategy for preliminary research in connection with drafting opposition to insurer's cross-motion for summary judgment.	0.20
06/08/2023	A A PEREZ	Develop strategy for U.S. Sugar's opposition to AIG's motion for summary judgment (1.3); review Luke Kurtz's deposition transcript to identify discussion of vendors (1.2); participate in teleconference with Gravity Stack regarding trial prep (.5); email opposing counsel regarding confidential documents (.1).	3.10
06/09/2023	W ANDREWS	Review AIG summary judgment motion and consider strategy in response.	1.00

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114033215
DATE: 07/28/2023
PAGE: 5

DATE	TIMEKEEPER	DESCRIPTION	HOURS
06/09/2023	A DEFIELD	Review strategy regarding AIG's late filing of AIG's brief.	0.20
06/09/2023	A A PEREZ	Research cases discussing when insurer has burden to prove defense to coverage (2.1); research cases discussing what reasonable hourly attorney rates are in cases similar to underlying action (4.1); analyze cases cited in AIG's motion for summary judgment in order to distinguish them in U.S. Sugar's opposition (3.4).	9.60
06/12/2023	W ANDREWS	Work on trial witness strategy and coverage case fees owed by AIG; outline arguments for brief in opposition to AIG motion for summary judgment.	1.70
06/12/2023	A DEFIELD	Develop strategy on brief and next steps.	0.50
06/12/2023	A A PEREZ	Analyze trial strategy (1.5); draft email to Luke Kurtz regarding trial strategy (.3); analyze possible arguments to add to opposition to (1.0)	2.80
06/12/2023	C D STEKLOF	Address various issues related to trial scheduling, witness preparation, upcoming litigation tasks, and opposition to AIG's summary judgment motion (2.4); communicate with team regarding same and opposition to AIG's motion for summary judgment (.8); analyze various issues related to reimbursement of fees and costs from AIG (.5); analyze AIG's motion for summary judgment, related materials, research performed in connection with same, and prior deposition transcripts in connection with opposition (4.8).	8.50
06/13/2023	A A PEREZ	Analyze what additional research is needed for motion for summary judgment (1.4); review vendor forms needed to make Jones Foster U.S. Sugar vendor (.3); review cases cited in AIG's summary judgment motion to identify quotes from cases that favor U.S. Sugar (3.5); analyze how to address AIG's argument that senior attorney should not be billing for reviewing social media (.5).	5.70
06/13/2023	C D STEKLOF	Analyze research regarding various issues in connection with opposition to AIG's motion for summary judgment and communicate regarding additional research and tasks for opposition (2.4); outline opposition to AIG's motion for summary judgment (4.9).	7.30
06/14/2023	W ANDREWS	Review and supplement draft outline of brief in opposition to AIG summary judgment motion; telephone call with Mr. Kurtz regarding trial and witness strategy.	2.00
06/14/2023	A DEFIELD	Develop strategy on draft and review and analyze draft outline.	0.60

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114033215
DATE: 07/28/2023
PAGE: 6

DATE	TIMEKEEPER	DESCRIPTION	HOURS
06/14/2023	J L HUCKABA	Analyze precedent cited in insurer's motion for summary judgment on the reasonableness of fees in connection with preparing opposition (2.2); prepare chart of precedent on attorney's fees in connection with preparing opposition to insurer's motion for summary judgment (1.8).	4.00
06/14/2023	A A PEREZ	Continue researching cases regarding insurer's burden to show defense costs were unreasonable (1.9); analyze how to proceed with response to summary judgment motion (1.0).	2.90
06/14/2023	C D STEKLOF	Draft outline of opposition to AIG's motion for summary judgment on defense expenses (3.0); communicate with team regarding outline and analyze key issues to address in opposition (1.0); begin drafting opposition to AIG's motion for summary judgment (4.7).	8.70
06/15/2023	W ANDREWS	Review motion to establish a special setting.	0.50
06/15/2023	J L HUCKABA	Analyze precedent nationwide on both hourly and across-the-board reduction of fees (2.6); prepare summary of precedent on the reduction of fees (.20); analyze precedent on waiver of defenses never raised in pleadings or during discovery (2.0); prepare summary of precedent from Florida federal courts on an insurer's waiver of defenses (.20).	5.00
06/15/2023	A A PEREZ	Analyze research regarding cases cited in AIG's summary judgment motion (.6); draft motion to continue trial (1.0); draft proposed order for motion to continue trial (.7); analyze local rules and federal rules of civil procedure in order to draft motion to continue trial (.5); analyze KB Holmes case in order to assist in drafting of response to AIG's summary judgment motion (.6); analyze recent decision applying across the board fee cut (.3)	3.70
06/15/2023	C D STEKLOF	Draft opposition to AIG's second motion for summary judgment regarding reasonableness of defense expenses	7.60
06/16/2023	A A PEREZ	Follow up with US Sugar regarding payment to Jones Foster (.2); revise draft motion to continue to incorporate Cary Steklof's comments (1.3); draft affidavit of Scott Hawkins in support of motion to continue trial (.4); draft affidavit of Walter Andrews in support of motion to continue trial (.8); draft affidavit of Timothy Bishop in support of motion to continue trial (.3)	3.00

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114033215
DATE: 07/28/2023
PAGE: 7

DATE	TIMEKEEPER	DESCRIPTION	HOURS
06/16/2023	C D STEKLOF	Review draft motion to continue trial and communicate regarding necessary revisions to same (.4); draft opposition to AIG's second motion for summary judgment regarding reasonableness of defense expenses (5.6).	6.00
06/19/2023	C D STEKLOF	Draft opposition to AIG's cross motion for summary judgment on reasonable and necessary fees	4.20
06/20/2023	W ANDREWS	Review strategy regarding AIG obligation for US Sugar fees; work on draft brief in opposition to AIG motion for summary judgment.	1.50
06/20/2023	J L HUCKABA	Evaluate strategy for researching precedent on reasonable and necessary as an affirmative defense and post-claim underwriting (.40); analyze precedent on "reasonable and necessary" as an affirmative defense (1.8); research precedent on post-claim underwriting in connection with preparing opposition to insurer's second motion for summary judgment (.70).	2.90
06/20/2023	A A PEREZ	Finalize letter to AIG regarding payments by US Sugar (.8); analyze policy to identify when it uses the language "reasonable and necessary." (.7); analyze research regarding across the board cuts (.6); revise motion to continue trial to incorporate Cary Steklof's further comments (.8); begin drafting U.S. Sugar's opposition to AIG's statement of facts (2.1)	5.00
06/20/2023	C D STEKLOF	Draft opposition to AIG's second motion for summary judgment regarding reasonableness and necessity of Defense Expenses (10.8); review draft motion to continue trial and communicate with Ms. Perez regarding same (.6); communicate regarding response to AIG's statement of material facts (.4).	11.80
06/21/2023	W ANDREWS	Work on brief in opposition to AIG motion for summary judgment; work on motion for specific trial setting.	2.80
06/21/2023	A DEFIELD	Develop strategy on response in opposition and case law cited herein.	0.50
06/21/2023	A DEFIELD	Review draft motion for continuance and supplement and revise same.	0.30

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114033215
DATE: 07/28/2023
PAGE: 8

DATE	TIMEKEEPER	DESCRIPTION	HOURS
06/21/2023	J L HUCKABA	Draft revisions to opposition to second motion for summary judgment regarding across-the-board fee reductions (.1.8); research precedent on affirmative defenses for insurers that avoid liability in whole or in part (.40); evaluate strategy for revising across-the-board reduction section of opposition to second motion for summary judgment (.30); analyze expert reports and deposition transcripts for support to disputed material facts in connection with opposition to second summary judgment motion (2.0); draft revisions to reply to insurer's statement of material facts (.40).	4.90
06/21/2023	A A PEREZ	Analyze AIG's statement of facts (1.2); Draft U.S. Sugar's opposition to AIG's statement of facts (6.1); revise motion to continue trial to incorporate Walter Andrews' comments (.4); revise affidavit of Walter Andrews in support of motion to continue trial (.2); revise affidavit of Scott Hawkins in support of motion to continue trial (.2); email opposing counsel regarding motion to continue trial (.2); analyze whether U.S. Sugar has AIG's exhibits which were to be filed under seal (.9); analyze policies attached to KB Homes and Morrette complaints to determine if they define Defense Expenses or Defense Costs elsewhere in the Policy (.3).	9.50
06/21/2023	C D STEKLOF	Work on revisions to opposition to AIG's summary judgment motion (.5); analyze issues related to opposition to AIG's statement of material facts (.7); conduct research to further support opposition (1.0); review and revise opposition to summary judgment motion (8.2).	10.40
06/22/2023	R G BOCZKAJ-GONZALEZ	Finalize for filing U.S. Sugar's Response in Opposition to Defendant's Motion for Summary Judgment.	0.50
06/22/2023	R G BOCZKAJ-GONZALEZ	Finalize for filing Plaintiff's Opposition to Defendant's Statement of Material Facts.	0.60
06/22/2023	J L HUCKABA	Draft further revisions to opposition to second motion for summary judgment (.50).	0.50
06/22/2023	A A PEREZ	Revise opposition to statement of facts (5.5); analyze whether documents need to be filed under seal in order to be on record (.9); assist in finalizing opposition to summary judgment for filing (.4)	6.80
06/22/2023	C D STEKLOF	Revise opposition to AIG's summary judgment motion, incorporate final additions and changes to same, and review final draft for filing with Court (6.6); review and revise opposition to AIG's statement of material facts in support of summary judgment motion (3.0); coordinate filing of opposition and related materials (.7).	10.30

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114033215
DATE: 07/28/2023
PAGE: 9

DATE	TIMEKEEPER	DESCRIPTION	HOURS
06/23/2023	A DEFIELD	Work with Ms. Perez on revisions to and finalizing motion for continuance as well as each affidavit.	1.90
06/23/2023	A A PEREZ	Revise declaration of Scott Hawkins (.7); revise declaration of Walter Andrews (.9); revise declaration of Tim Bishop (.6); revise motion to continue trial (1.5); confer with opposing counsel regarding motion to continue trial (.3); prepare motion to continue trial and exhibits for filing (.4).	4.40
06/26/2023	A DEFIELD	Review order and provide instruction to team.	0.20
06/26/2023	J L HUCKABA	Evaluate strategy for hearing and trial preparation in light of judge's order continuing trial.	0.70
06/26/2023	A A PEREZ	Analyze Court's order on motion to continue trial (.2); develop strategy for case in light of order on motion to continue trial and summary judgment briefing (.8).	1.00
06/26/2023	C D STEKLOF	Analyze motion to continue trial, various correspondence related to same, and Court order granting motion (1.0); analyze next steps regarding pretrial preparation and status conference in light of same (.8); address various issues related to preparation for status conference in light of numerous pending motions and scheduling issues for attorneys and witnesses (3.6).	5.40
06/27/2023	A A PEREZ	Draft email to witnesses regarding trial update.	0.40
06/27/2023	C D STEKLOF	Address various issues related to trial preparation and status conference with Court to set trial date and potentially address pending motions	1.80
06/28/2023	A A PEREZ	Email witnesses regarding trial availability.	0.40
06/28/2023	C D STEKLOF	Analyze scheduling conflicts for trial witnesses, communicate regarding same, and prepare for status conference with Court	1.70
06/29/2023	A A PEREZ	Analyze Mr. Baker's unavailability for trial (.3); analyze Scott Hawkins unavailability for trial and email him regarding the same (.4).	0.70
06/29/2023	C D STEKLOF	Analyze issues related to special setting trial and conflicts in connection with same (.7); address various issues related to preparation for court conference to address same (.8); draft analysis regarding timeline for future recovery and potential outcomes associated with summary judgment motions (1.6).	3.10
06/30/2023	W ANDREWS	Review new court order on trial and consider implications; review draft case outline and budget requested by client.	0.50
06/30/2023	R G BOCZKAJ-GONZALEZ	Update summary of witnesses' availability in connection with attorneys' re-scheduling trial proceedings at the upcoming status conference.	0.70

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114033215
DATE: 07/28/2023
PAGE: 10

DATE	TIMEKEEPER	DESCRIPTION	HOURS
06/30/2023	J L HUCKABA	Analyze precedent cited in insurer's reply in support of its motion for summary judgment on reasonable and necessary fees.	0.50
06/30/2023	A A PEREZ	Analyze reply in support of AIG's summary judgment motion (.7); email Scott Hawkins regarding unavailability (.3); email Greg Schwinghamer regarding unavailability (.1).	1.10
06/30/2023	C D STEKLOF	Address various issues related to trial planning, coordination of witnesses, and preparation for status conference with Court and potential argument on pending motions	1.70
TOTAL HOURS			293.40

TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	18.50	1,247.00	23,069.50
A DEFIELD	Partner	23.10	932.00	21,529.20
C D STEKLOF	Counsel	114.30	869.00	99,326.70
J L HUCKABA	Associate	29.60	536.00	15,865.60
A A PEREZ	Associate	101.40	779.00	78,990.60
R G BOCZKAJ-GONZALEZ	Paralegal	6.50	378.00	2,457.00
TOTAL FEES (\$)				241,238.60

FOR COSTS ADVANCED AND EXPENSES INCURRED:

CODE	DESCRIPTION	AMOUNT
E106	Online Research	584.12
TOTAL CURRENT EXPENSES (\$)		584.12

INVOICE SUMMARY:

Current Fees:	\$ 241,238.60
Current Charges:	584.12
CURRENT INVOICE AMOUNT DUE:	\$ 241,822.72

HUNTON ANDREWS KURTH

HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114033302
DATE: 08/07/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending July 31, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG

Current Fees:	\$ 21,510.20
Current Charges:	0.00
CURRENT INVOICE AMOUNT DUE:	\$ 21,510.20

OUTSTANDING INVOICE SUMMARY (FOR MATTER(S) ON THIS INVOICE):

INVOICE	MATTER #	DATE	BALANCE
114033020	0000016	06/30/2023	501,787.90
114033215	0000016	07/28/2023	241,822.72

Outstanding Balance (for matter(s) on this invoice): 743,610.62

TOTAL AMOUNT DUE (including Current Invoice Amount Due): 765,120.82

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Information with Wire: File: 054740.0000016, Inv: 114033302, Date: 08/07/2023

HUNTON ANDREWS KURTH

HUNTON ANDREWS KURTH LLP
WELLS FARGO CENTER, SUITE 2400
333 SE 2ND AVENUE
MIAMI, FL 33131

TEL 305 • 810 • 2500

EIN 54-0572269

INVOICE DETAIL

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114033302
DATE: 08/07/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH JULY 31, 2023:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
07/03/2023	W ANDREWS	Review strategy regarding AIG fee demand.	0.20
07/03/2023	C D STEKLOF	Revise analysis to client regarding case timeline and related matters in light of recent court order (.4); exchange correspondence with expert regarding case status (.2); address various issues related to litigation and next steps (1.1).	1.70
07/05/2023	R G BOCZKAJ-GONZALEZ	Update summary of witnesses' availability in connection with attorneys' re-scheduling trial proceedings at the upcoming status conference.	0.40
07/05/2023	C D STEKLOF	Draft correspondence to AIG regarding failure to receive reimbursement for second tranche of attorneys' fees and costs in order to obtain payment	0.40
07/06/2023	W ANDREWS	Review AIG correspondence regarding fees owed and consider response.	0.30
07/06/2023	C D STEKLOF	Analyze correspondence from AIG regarding refusal to reimburse second tranche of attorneys' fees and costs and outline response to same (.8); draft response to AIG regarding same in order clarify record (3.2); address various issues related to expert and deposition invoices (.6).	4.60
07/07/2023	W ANDREWS	Review fee recovery strategy regarding AIG.	0.50
07/07/2023	C D STEKLOF	Draft and revise correspondence to AIG regarding refusal to reimburse second tranche of defense expenses (2.2); revise analysis to client regarding future budget and timeline for recovery (.7); draft and revise analysis to client regarding AIG's refusal to pay further defense expenses and future recovery under Florida fee shifting statute (1.5); address various issues related to litigation and next steps in connection with same (1.3).	5.70

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

INVOICE: 114033302
DATE: 08/07/2023
PAGE: 2

DATE	TIMEKEEPER	DESCRIPTION	HOURS
07/09/2023	W ANDREWS	Review and supplement draft correspondence to AIG regarding fees owed and explanations for same.	0.50
07/10/2023	A A PEREZ	Analyze docket in order to develop strategy for case moving forward.	0.60
07/10/2023	C D STEKLOF	Finalize and send correspondence to client regarding budgeting, timeline for recovery, and AIG's refusal to reimburse defense expenses (.5); analyze issues to address prior to status hearing with Court (.7); communicate with client regarding budgeting (.5); calculate interest owed in connection with outstanding amounts owed by AIG and draft correspondence to client regarding same (.5); address issues related to litigation and response to AIG on refusal to reimburse defense expenses (1.0).	3.20
07/11/2023	W ANDREWS	[REDACTED]	0.20
07/11/2023	C D STEKLOF	[REDACTED] (.5); finalize correspondence to AIG regarding refusal to reimburse defense expenses and address various issues related to litigation (.9).	1.40
07/12/2023	W ANDREWS	Review Mr. Kurtz's proposed changes to AIG letter.	0.20
07/14/2023	A A PEREZ	Analyze viability of AIG's argument regarding covering Hunton's fees.	0.60
07/14/2023	C D STEKLOF	Analyze AIG's reply in support of motion for summary judgment (.9); analyze issues related to recoverability of fees under Florida's fee shifting statute (1.0).	1.90
07/20/2023	V CHAPUNOFF	Review next steps regarding case status	0.20
07/20/2023	C D STEKLOF	Review strategy regarding most recent developments in litigation and address various issues in connection with same going forward	1.40
07/25/2023	C D STEKLOF	Analyze potential motions that could be subject to oral argument at forthcoming court hearing	0.20
07/31/2023	C D STEKLOF	Exchange correspondence with client regarding various issues related to next steps with litigation	0.20
TOTAL HOURS			24.40

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
FILE NUMBER: 054740.0000016

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TIMEKEEPER SUMMARY:

TIMEKEEPER	STATUS	HOURS	RATE	VALUE
W ANDREWS	Partner	1.90	1,247.00	2,369.30
C D STEKLOF	Counsel	20.70	869.00	17,988.30
A A PEREZ	Associate	1.20	779.00	934.80
R G BOCZKAJ-GONZALEZ	Paralegal	0.40	378.00	151.20
V CHAPUNOFF	Paralegal	0.20	333.00	66.60
TOTAL FEES (\$)				21,510.20

INVOICE SUMMARY:

Current Fees: \$ 21,510.20
Current Charges: 0.00

CURRENT INVOICE AMOUNT DUE: \$ 21,510.20

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EIN 54-0572269

INVOICE SUMMARY

U.S. Sugar Corporation
ATTN: Luke Kurtz
111 Ponce de Leon Avenue
Clewiston, FL 33440-3098

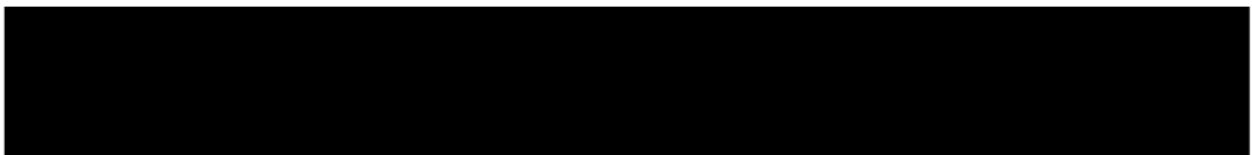
FILE NUMBER: 054740.0000016
INVOICE NUMBER: 114033495
DATE: 09/21/2023

CLIENT NAME: U.S. Sugar Corporation
BILLING ATTORNEY: WALTER ANDREWS

Statement for professional services and charges rendered in connection with the referenced matter(s), for the period ending August 31, 2023 per the attached itemization:

CURRENT INVOICE SUMMARY:

RE: (Hunton # 054740.0000016) Coverage Action against AIG



TO RECEIVE PROPER CREDIT, PLEASE ATTACH REMITTANCE COPY WITH PAYMENT.

FOR BILLING INQUIRIES, PLEASE CALL: 804-788-8555

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ATLANTA, GA 30384-5759

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INVOICE SUMMARY-REMITTANCE PAGE

U.S. Sugar Corporation
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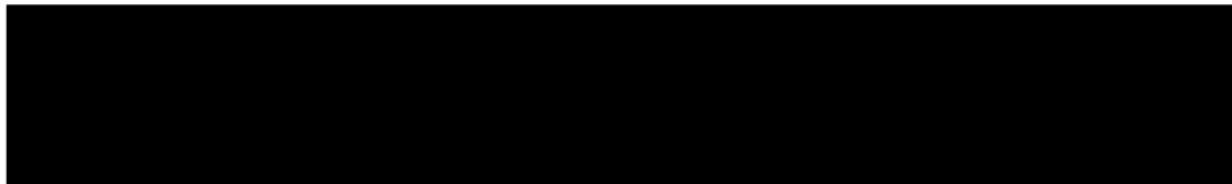
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BILLING ATTORNEY: WALTER ANDREWS

RE: (Hunton # 054740.0000016) Coverage Action against AIG

FOR PROFESSIONAL SERVICES RENDERED THROUGH AUGUST 31, 2023:

DATE	TIMEKEEPER	DESCRIPTION	HOURS
08/01/2023	A A PEREZ	Follow up with witnesses regarding availability for trial.	0.40
08/01/2023	C D STEKLOF	Address various issues in preparation for hearing to special set trial	0.30

U.S. Sugar is reserving its right to seek reimbursement of the redacted time entries, which were incurred in preparing U.S. Sugar's Verified Motion for Attorneys' Fees and Expenses and Pre- and Post-Judgment Interest. U.S. Sugar will provide unredacted invoices to the Court, upon the Court's request.

08/02/2023	V CHAPUNOFF	Identify and analyze correspondence (including emails) and documents received since May 31, 2023.	0.70
08/02/2023	V CHAPUNOFF	Analyze next steps in connection with setting trial date.	0.20
08/02/2023	V CHAPUNOFF	Analyze docket entries 120-145, related to Defendant's motions for leave to file confidential documents under seal, Plaintiff's motion for summary judgment, Defendant's motion for summary judgment, Defendant's motion for leave to file a cross motion for summary judgment, Plaintiff's statement of material facts, Defendant's statement of material facts, and Plaintiff's unopposed motion to continue trial, and supplement pleadings index to reflect updates.	1.60
08/02/2023	V CHAPUNOFF	Analyze information in connection with invoice dispute, and correspond with Esquire and attorneys regarding same.	0.80

HUNTON ANDREWS KURTH LLP
CLIENT NAME: U.S. Sugar Corporation
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DATE	TIMEKEEPER	DESCRIPTION	HOURS
08/02/2023	A A PEREZ	Email Scott Hawkins regarding trial availability (.4); email Tim Bishop regarding trial availability (.3); email Luke Kurtz regarding trial availability for him and Mr. Buker (.3); analyze what weeks U.S. Sugar and its witnesses are available for trial to respond to opposing counsel's email regarding the same (.5).	1.50
08/02/2023	C D STEKLOF	Review correspondence from opposing counsel and U.S. Sugar's witnesses regarding availability for trial (.4); address various issues in preparation for upcoming court hearing to set trial date (.8).	1.20

U.S. Sugar is reserving its right to seek reimbursement of the redacted time entries, which were incurred in preparing U.S. Sugar's Verified Motion for Attorneys' Fees and Expenses and Pre- and Post-Judgment Interest. U.S. Sugar will provide unredacted invoices to the Court, upon the Court's request.

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[REDACTED]

[REDACTED]

[REDACTED]

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